

### <u>UPDATED</u>

# VR Portion of WIOA State Plan for the State of Mississippi FY 2018 - 2020

# VR Portion of WIOA State Plan for the State of Mississippi FY-2018.

### Program-Specific Requirements for Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan\* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

### a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

In matters of program administration and planning, the Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Office of Vocational Rehabilitation for the Blind has a strong commitment to seeking the advice of consumers of vocational rehabilitation services, service providers, family members, advocates, employers and others interested in disability issues.

Comprised of representatives of these stakeholder groups, the State Rehabilitation Council makes a major contribution to the VR/VRB program through advice provided during regular SRC business meetings, Policy Committee meetings, and other activities the members determine to be appropriate.

During February and March 2018, OVR/OVRB developed and updated the 2018 State Plan. OVR/OVRB explained to stakeholders the process the State has to comply with the requirements of reauthorization and WIOA. We provided the link to the plan and posted for public comment until March 19th. SRC Members and Stakeholders were able to view the modifications to the Combined State Plan, as well as, the Plan as a whole.

The DSU accepts the recommendations from the SRC. Below are the comments and the DSUs response to those comments.

**SRC Questionnaires** 

<sup>\*</sup> Sec. 102(b)(D)(iii) of WIOA

1. Do you have any comments or recommendations for input into the Mississippi Department of Rehabilitation Services' Office of Vocational Rehabilitation or Vocational Rehabilitation for the Blind (OVR/OVRB) service delivery system?

**SRC Comment**: Very informative report from LaVonda.

**DSU Response**: The State Rehabilitation Council is a very important partner in the success of the VR program in Mississippi and the consumers we serve. Their interest in the policy, procedures, performance, consumer satisfaction and implementation of WIOA has been a key element in our continued pursuit of innovations that provide high quality VR services to the individuals we serve. With input from the SRC, we will continue to strive to improve our service delivery through our programs and services. The SRC's input is greatly appreciated and necessary to ensure that the needs of the people with disabilities remain at the forefront of all our efforts.

#### SRC Comment:

- Dorothy has worked diligently on making the job fair a success.
- Good job on the upcoming job fair for citizens with disabilities.
- Great report from Dorothy regarding job fairs. Wonderful to have that kind of success.

### DSU Response:

OVR/OVRB is proud to have played a part in assisting individuals with disabilities in this state. Our staff is honored to enable our clients the ability to share their skills and talents in Mississippi's workforce and to experience greater independence and self-sufficiency.

#### SRC Comment:

 Job Developers should get job goals from counselors to seek out jobs that current consumers want.

### DSU Response:

VR Counselor and VR Career Counselors provide the Office of Business Development with job goals for each client.

#### SRC Comment:

• I believe the teams described to evaluate & enhance quality services provision are a new approach that will be successful.

### DSU Response:

VR/VRB appreciates comments and will also feel that that teams will assist in providing quality services to our consumers and also assist in addressing the needs of the staff.

2. Having heard this quarter's report on the results of consumer satisfaction surveys, do you have any comments or recommendations for input into the service delivery process?

SRC Comments:

- Overall satisfaction remains high this quarter after reviewing the satisfaction survey for the quarter.
- Results are positive on satisfaction surveys. Look forward to hear report from CAP and MDRS on any grievances filed.
- Consumer responses indicate service delivery process is meeting their needs.
- Good report.

### DSU Response:

VR/VRB will continue to receive information from our consumers by the Client Assistance Program, internal audits, MSU audits and the Client Services Director's office. While we are very happy with the positive comments our consumers direct to us we also appreciate the negative feedback as this is something we can learn from and strive to improve.

## 3. Do you have any comments or recommendations for input in terms of potential service providers or discussions on the performance of service providers currently being used by OVR/OVRB?

#### SRC Comments:

- High Quality, Assessable and Confidential important considerations for providers.
- By satisfaction surveys, consumers seem to be happy with overall providers.
- Increase Internship program as funds allow.

### DSU Response:

VR and VRB will continue to strive to meet the demands and requests of our service providers where possible. We also will continue to strive to meet the needs and desires of our consumers.

### Presentation of Information on Policy

### 4A. Do you have any comments or recommendations concerning the Career Counselor Presentation? Business Development?

### SRC Comments:

- LouEllen enhanced her presentation with a colorful handout. I think the career counselor program is very beneficial however there is an overlap in services provided by AbilityWorks.
- More VR counselors with smaller caseloads might alleviate the need for separate career counselors.
- Josh did a great job explaining BDS and the benefit of that program brining more awareness to MDRS and AW.
- Are the business development professionals starting with career goals of the clients?
   (when contacting business).
- Having list of IPE goals written?

### DSU Response:

Our Career Counselors (VR Counselors) work collaboratively with the caseload carrying counselors to ensure that the individuals we serve are job ready and ready to meet the demands of the opportunities and relationships that have been developed in Mississippi's workforce by our Office of Business Development. The Career Counselor's assist the VR Counselor to prepare clients for job interviews, resume building, etc. AbilityWorks do not provide this type of training/preparation.

### 4B. Do you have any comments or recommendations concerning the presentation on services offered at AbilityWorks-Vocational Evaluation?

#### SRC Comments:

- Excellent service to lead to the most positive outcomes.
- Very exciting improvements being made for AbilityWorks.
- Good Report.

### **DSU Response:**

Our staff that provide services to our clients at AbilityWorks (community rehabilitation programs) received additional training and tools to help ensure that counselors have the support and services needed to ensure that our consumers are aiming for vocational goals and employment outcomes that are consistent with their strengths, interests, capabilities, resources and informed choice and goals and opportunities that are available in Mississippi's labor market.

### 4C. Do you have any comments or recommendations concerning the presentations on the new VR/VRB Teams that have been created?

Find a way to measure the effectiveness of these teams in terms of consumer outcomes.

### DSU's Response

Our teams will continue to come to the table to work through processes and procedures to ensure that staff has the resources and tools needed to move consumers toward competitive integrated employment opportunities.

We look forward to our continued partnership in ensuring that Mississippi's job seekers with disabilities have access to the highest quality employment and training services that our job fairs and internships provide. We will continue to strive to increase the number of participants in these programs each year.

#### Results of 2017 Consumer Satisfaction Survey

A consumer satisfaction survey is conducted four times per year to determine the consumer satisfaction regarding closed cases during the year.

An outside marketing firm, Wolfgang Frese Survey Research Laboratory of Mississippi State University, conducted the survey for the SRC.

The ratings for the various services consumers received are presented below using the average (means) score given to each item by all respondents interviewed. If an item did not apply to a

particular respondent or if the consumer did not know or refused to rate an item he/she is not included in calculating the average score for that item. The seven items rated are in Table 1 (for exact wording, reference the questionnaire.) Chart 1 is included for an easy visual comparison. The respondents were asked to rate the items (Questions 1-9) on a scale from 1 to 5, with 1 being poor and 5 being excellent. Thus, a high score indicates that the service was good and a low score that it was poor..

### **Table 1 - Service Ratings by Consumer**

Rate the following items on a scale of 1 to 5, with 1 being poor and 5 being excellent.

	Number of Counselors	Average Rating (mean)
The help provided by the VR staff at the time you applied for VR services.	1,002	4.69
The help provided by the VR staff during the planning of your services.	998	4.68
The help provided by the VR staff when you were receiving your VR services.	992	4.69
The help you received from other agencies or service providers.	303	4.42
Your employment outcome.	796	4.49
Employment benefits provided by your new employer.	480	3.90
Overall, how do you rant the services you received?	997	4.69

### 2. the Designated State unit's response to the Council's input and recommendations; and

Please see the section above.

### 3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.

Please see the section above.

### b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

### 1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Does not apply. MDRS has not requested a waiver of statewideness for any VR service.

### 2. the designated State unit will approve each proposed service before it is put into effect; and

Does not apply. MDRS has not requested a waiver of statewideness for any VR service.

### 3. All State plan requirements will apply

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Does not apply. MDRS has not requested a waiver of statewideness for any VR service.

### c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

### 1. Federal, State, and local agencies and programs;

The Mississippi Department of Rehabilitation Services (MDRS) collaborates and coordinates services with federal, state and local employment and agencies that contribute to the vocational rehabilitation (VR) of Mississippians with disabilities.

The Office of Vocational Rehabilitation has always strived to maximize and improve the level of services afforded to individuals with the most significant disabilities.

OVR's commitment to serving individuals with the most significant disabilities is substantiated by the fact that thus far in FY 2017, 72% of those individuals rehabilitated are classified as significantly disabled.

The methods utilized by VR to expand and improve services to individuals with significant disabilities in our State will be enhanced and ongoing throughout the period FFY 2018 to 2019. These "methods" entail several administrative and programmatic activities intended to facilitate and/or maintain expansion of services for individuals with significant disabilities.

#### **COOPERATIVE AGREEMENTS:**

MDRS and OVR makes a concerted effort to utilize all available resources to provide the highest quality and most cost-effective services to individuals with significant disabilities. Since several organizations provide various services this individuals with disabilities, those resources are tapped, whenever and wherever possible.

In order to accomplish this, OVR relies on many cooperative agreements, memorandums of understanding and contracts with various agencies, organizations and groups.

The entities that OVR is actively involved with include, but is not limited to:

• Mississippi Department of Education for the coordination of transition services and local school districts to carry out transition and youth career services plus implement a Transition Specialist in participating local school districts;

- Hinds Community College for the Deaf Services Program;
- **Division of Medicaid** to provide seamless, non-duplicated services to individuals who are eligible for both Medicaid and VR services and for maximum utilization of resources between the two agencies;
- **Department of Mental Health** (DMH) Planning and Advisory Council as federally mandated for advice and support. DMH to cover the costs for therapeutic medical services offered at secondary alcohol and drug treatment centers that have been approved by DMH;
- Department of Mental Health -Bureau of Intellectual and Developmental Disabilities to continue enhancing, expanding, and developing methods to support eligible persons with intellectual and developmental disabilities who express a desire for competitive integrated employment; establish a state-level work group to address system, policy and funding issues that impede the continuous provision of employment services by MDRS and DMH; engage MDRS staff and DMH providers and stakeholders at the local level in collaboration and cooperation in the accomplishment of the vision and desired outcomes; identify and disseminate best practices including training and funding strategies; and, provide individuals with intellectual and developmental disabilities with quality employment services that lead to competitive integrated employment in a non-duplicated and seamless manner;
- **Department of Human Services** (DHS)-Division of Family and Children Services to assess foster care participants who are diagnosed as having physical and/or mental disabilities; DHS-Division of Field Operations to assist TANF recipients who are diagnosed with physical and/or mental disabilities;
- Mississippi Band of Choctaw Indians for interagency referrals for vocational rehabilitation services, including transition planning, to Choctaw Indians;
- U. S. Department of Veterans Affairs to improve work opportunities for veterans with disabilities and coordinate a referral and service delivery process;
- Warren-Yazoo Mental Health Service-Program of Assertive Community Treatment (PACT) to facilitate the most effective and efficient process to assist PACT recipients gain access to vocational rehabilitation services;
- **Department of Transportation** to coordinate transportation and related program resources and services at the state level wherever possible and promote maximum feasible coordination at the local level;
- Institute for Disability Studies to operate Project Search for students with developmental disabilities and to foster and facilitate the acquisition of jobs by people with disabilities; and, Mississippi State University, T.K. Martin Center to provide for evaluations pertaining to assistive technology, primarily related to seating, positioning and mobility; adaptive driving, including bioptic driving; vehicle modification, and, augmentative and alternative communication;
- Mississippi State University, Student Support Services, and the University of Southern Mississippi, Institute for Disability Studies are to operate the Peer Mentoring program to

provide self-advocacy training as part of pre-employment transition services for post-secondary students with disabilities, and to assist with the transition of these students into post-secondary education in order to achieve degrees in higher education that allow for successful careers.

### 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

MDRS administers Mississippi's Project START (Success Through Assistive Rehabilitative Technology), the state program carried out under section 4 of the Assistive Technology Act of 1998, for education awareness and access to Assistive Technology.

The Mississippi Department of Rehabilitation Services operates an Assistive Technology Program to assure the adequate and appropriate utilization of rehabilitation engineering assistance to individuals with disabilities. OVR makes referrals to this program.

The rehabilitation engineering assistance provided includes a range of services to assist individuals with physical and/or cognitive disabilities that can be addressed through modification, alteration or renovation via development or use of technological devices, or by way of other technology-related assistance.

In order to provide timely and quality rehabilitation engineering services, MDRS has Assistive Technology Specialist located throughout the state in MDRS offices.

### 3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

MDRS has developed a relationship with the local office of the U.S. Department of Agriculture to gather information, build relationships, and develop cooperative efforts to provide services to Mississippians with a disability.

### 4. Noneducational agencies serving out-of-school youth; and

Some of the noneducational agencies serving out of school youth in which VR has memorandums of understanding as follows:

- Division of Medicaid
- Ms. Dept. of Human Services Div. of Family and Children Services
- Dept. of Mental Health Bureau of Intellectual/ Developmental Disabilities
- Institute for Disability Studies
- Ms Dept of Human Services TANF
- Warren Yazoo Mental Health Services
- Ms Band of Choctaw Indians
- Department of Veteran Affairs

### 5. State use contracting programs.

MDRS has no contracting programs.

### d. Coordination with Education Officials

Describe:

### 1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

Information on the formal interagency agreement with the State educational agency with respect to:

One of the Mississippi Department of Rehabilitation Services major goals is to emphasize the employment potential if students with disabilities and to improve the outreach and outcomes for students and youth with disabilities.

To accomplish this goal, MDRS will continue to work with local school officials to implement Pre-Employment Transition Services (Pre-ETS) and to facilitate a smooth transition from education to vocational rehabilitation (VR) services and employment. This approach provides a continuum of services directed toward additional post-secondary education or direct entry into the workforce.

VRB works closely with the education system through the VR Transition and Youth Career Services Program. There are approximately 20 VRB Counselors throughout the state who work in preparing students with vision loss for entry into the world of work. They serve as informational resources for teachers and other educational staff as well as provide resources and information about blindness for parents and transitioning youth throughout development of the youth's individualized plan for employment (IPE).

VRB Counselors work closely with parents, education staff, and community service providers to promote development of skills needed for students to become as independent as possible and competitive in terms of employment. In addition to training parents and students about the special education rights and responsibilities, VRB provides educational support by working with the VR Transition Team, school officials, and families to develop and implement the IPE. Goals developed in the Individualized Education Program (IEP) are included in the IPE to facilitate successful completion of those goals.

The IPE is completed during the transition process so it is in place before students exit secondary education. Services prepare students to be confident and competent to maximize their potential to achieve success.

VR works closely with the education system throughout the state. There are between 75 to 85 VR Counselors throughout the state who work in preparing students with disabilities for entry into the world of work.

The goal is to help the youth and students with disabilities achieve a seamless transition from high school into the world of work, community, vocational or post-secondary education, and/or

other planned outcomes. OVR administers the VR Transition and Youth Career Services Program as specified in Title I of the Rehabilitation Act of 1973, as amended.

District level VR offices and local education districts work together in maintaining local agreements between each VR district office and the local school districts as to how to carry out transition services.

There are nearly 150 of these agreements with various school districts resulting in services to about 440 schools. These agreements are shared with other state agencies, family members, and consumer groups to ensure the seamless transition of services for students. The agreements do not include any specified financial agreement other than the implied cost for serving youth and students with disabilities.

### Policies and procedure to facilitate the transition of students from school to receipt of VR services

Restructuring of the VR Transition and Youth Career Services Program has resulted in additional VR Counselors carrying transition and youth cases, which provides for more individualized services to both eligible and potentially eligible students in school. VR Counselors work with the students, parents, and school personnel as well as attend (IEP) meetings to help identify students that may be able to benefit from transition and youth career services.

Prior to making services available, the VR Counselor uses school documentation, health records, and other pertinent information as deemed appropriate for determining a student with a disability potentially eligible for pre-employment transition services and/or for determination of eligibility for the VR Transition program.

The VR Counselor may then collaborate with the student, family members, school district personnel, and others to provide pre-employment transition services (Pre-ETS). MDRS has set aside 15% of its Reserve in order to make the Pre-ETS available to all eligible and potentially eligible students with a disability. Pre-ETS are five required activities that must be made available for students between the ages of 14 to 21 years old. Pre-ETS include the following: a) job exploration counseling; b) work—based learning experiences; c) counseling on enrollment in comprehensive transition or postsecondary educational programs; d) workplace readiness training; and, e) instruction in self-advocacy. Pre-ETS should be planned on an eligible student's Individualized Plan for Employment (IPE) through informed choice if they were not previously provided by VR prior to the student applying for VR transition services, or if it is determined that additional Pre-ETS are needed.

Transition planning between MDRS and MDE ultimately helps with the successful development and implementation of both the IEP and the IPE.

MDRS through the Office of Vocational Rehabilitation and Vocational Rehabilitation for the Blind have recently sent Request for Proposals for third party providers to provide Pre-ETS activities in accordance with the Workforce Innovation & Opportunity Act. At this time, two proposals have been awarded contracts and additional Request for Proposals are being sought.

Transition and youth career services include, but are not limited to, job search skills, work evaluation, development of an IPE, basic money management, social skills, and job readiness training along with continuous counseling and guidance. These services may be performed solely

by the VR Counselor, in collaboration with other service providers, or in coordination with an education teaching professional.

The VR Counselor also works with the classroom teacher implementing Pre-ETS services. The VR Counselor is prepared to teach the Pre-ETS curriculum in conjunction with providing the classroom teacher with information, technical assistance, and/or curriculum materials as needed. The VR Counselor supervises the student in this program, documents the student's progress, and shares information with the classroom teacher on a regular basis.

VR continues to emphasize best practices in providing services to youth and students with disabilities in order to provide a seamless transition to subsequent work or other environments. This emphasis on best practices, in part, is achieved by continuous training of staff working with youth and students with disabilities.

VR assures that, with respect to students with disabilities, the state has developed and implemented strategies to address the needs identified in the FFY 2018 Comprehensive Statewide Assessment of Rehabilitation Needs; strategies to achieve the goals and priorities identified by the state to improve and expand VR services for students with disabilities on a statewide basis; and, has developed and will implement strategies to provide pre-employment transition services.

MDRS also assures that with respect to students the needs identified in the state has developed and will implement new strategies to address the needs identified in the FFY 2018 Comprehensive Statewide Assessment.

### 2. Information on the formal interagency agreement with the State educational agency with respect to:

A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

Mississippi has both a state level agreement, "Memorandum of Agreement for Transition Planning for Secondary Students with Disabilities between the Mississippi Department of Rehabilitation Services (MDRS) and the Mississippi Department of Education" (MDE), and a local level "Agreement of Corporation" with each of our school districts.

The scope of services between MDRS and MDE are described in (d)2. The scope of services between MDRS and the local school districts are intended to serve as a mechanism for OVR/OVRB and the local school districts to clearly specify the plans, policies and procedures for coordinating services to facilitate the transition of students with disabilities, including:

- 1. Responsibilities of MDRS/OVR
- 2. Responsibilities of School District
- 3. Referral Process
- 4. Joint Development of IEPs and IPEs; and

5. Coordination necessary and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by WIOA, with regard to students with disabilities who are seeking subminimum wage employment

This Memorandum of Agreement for Transition Planning for Secondary Students with Disabilities between is made and entered into by and between the Mississippi Department of Rehabilitation Services, hereafter referred to as "MDRS," for and on behalf of its Offices of Vocational Rehabilitation and Vocational Rehabilitation for the Blind, hereafter referred to as "OVR/OVRB," and the Mississippi Department of Education, for and on behalf of its Office of Special Education, hereafter referred to as "MDE OSE."

Both the Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act of 1973 (the Rehabilitation Act), as amended by The Workforce Innovation and Opportunity Act (WIOA), require State Educational Agencies (SEA) and Vocational Rehabilitation (VR) agencies to plan and coordinate transition services, as well as pre-employment transition services for students with disabilities through a formal interagency agreement (Section 612(a)(12) of the IDEA and Section 101(a)(11)(D) of the Rehabilitation Act).

A formal interagency agreement is mandated under the Individuals with Disabilities Education Act (IDEA) 34 CFR 300.154, and section 101(a) (11) (D) of the Rehabilitation Act and its implementing regulations at 34 CFR 361.22 (b). Additional references used in this document include Sections 113 and 511 of the Rehabilitation Act, and the Final Regulations: State Vocational Rehabilitation Services Program; State Supported Employment Services Program; Limitations on Use of Subminimum Wage. This agreement is designed to improve the cooperative and collaborative efforts between the OVR/OVRB, and MDE OSE to coordinate the receipt of pre-employment transition services, transition services and other vocational rehabilitation (VR) services to students with disabilities who are eligible for special education services under the Individuals with Disabilities Act (IDEA), students who have a 504 plan, and other students with disabilities who are eligible or potentially eligible for services through OVR/OVRB, in order to facilitate their smooth transition from school to post-school employment-related activities and competitive, integrated employment.

It is also the intent of this agreement to serve as a mechanism for OVR/OVRB and MDE OSE to clearly specify the plans, policies and procedures for coordinating services to facilitate the transition of students with disabilities, including:

- 1. Consultation and technical assistance in the planning for the transition of students with disabilities;
- 2. Transition planning by OVR/OVRB and educational personnel that facilitates the development and implementation of a student's individualized education plan (IEP);
- 3. Roles and responsibilities, including financial and programmatic responsibilities of each agency;

- 4. Procedures for outreach to and identification of students with disabilities;
- 5. Assessment of students' potential need for transition services and preemployment transition services;
- 6. Coordination necessary and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by WIOA, with regard to students with disabilities who are seeking subminimum wage employment.; and an
- 7. Assurance that the MDE OSE will not enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

Additional considerations include grievance procedure to resolve disputes between OVR/OVRB and the MDE OSE, as appropriate, as well as procedures to resolve disputes between an individual with a disability and the entities specified above, and information about the Client Assistance Program.

B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Please see the section above.

C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Please see the section above.

D. procedures for outreach to and identification of students with disabilities who need transition services.

Please see the section above.

### e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

MDRS develops a formal fee for service contract with private non-profit vocational rehabilitation service providers. The contract contains all necessary clauses and each contract is approved by the state's Assistant Attorney General assigned to MDRS. The contracts are executed by the MDRS Executive Director and the principal of the private non-profit vocational rehabilitation service provider.

MDRS has the following contracts (agreements) with private nonprofit vocational rehabilitation service providers:

1. Goodwill Industries of South Mississippi - an agreement to provide work evaluation and job readiness training.

- 2. Goodwill Industries of Jackson an agreement to provide work evaluation and job readiness training.
- 3. Mississippi Industries for the Blind (MIB) a summer program to provide clients with job seeking skills, assistance in preparation of job applications, provision of work experience/work adjustment training, and evaluation (with assistance of MDRS Vocational Rehabilitation for the Blind staff) of client skill levels to identify marketable skills and potential outplacement.

MDRS has the authority to enter into contracts with for-profit organizations for the purpose of providing, as vocational rehabilitation services, on-the-job training and related programs for individuals with disabilities upon determination that such for-profit organization is better qualified to provide such rehabilitation services than non-profit agencies and organizations. However, MDRS does not currently have any such contracts in place with for-profit organizations.

### f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

MDRS administers the Supported Employment (SE) Program as specified in Title VI of the Rehabilitation Act and amended in WIOA. VR works extensively with other state agencies, private non-profit entities, employers, family members, and consumer groups to ensure quality SE services are provided to all eligible individuals throughout all phases of the SE service delivery system.

MDRS- VR has entered into formal cooperative agreements with the Mississippi Division of Medicaid (Medicaid) and Department of Mental Health, Bureau for Intellectual and Developmental Disabilities, with respect to delivery of VR services, including extended services, for individuals with the most significant disabilities eligible for home and community-based services.

In addition to these formal agreements, MDRS collaborates on a more informal basis with public and private entities to ensure a comprehensive program of services is provided to SE eligible individuals.

Collaborative partners include local mental health facilities, Medicaid's Bridge to Independence Program to help people move from qualified institutions to homes in the community, local school districts, businesses and industries, local projects funded by the DD Council, workforce development one-stop career centers, advocacy groups, and other relevant third parties as well as parents of SE eligible individuals.

The collaboration with DMH has resulted in a formalized referral process between the two agencies to ensure an array of services is provided to individuals with the most significant disabilities, opening up many new options for them. The MDRS SE Program Coordinator

receives the referral from the DMH Mental Health Support Coordinator/Target Case Manager. After review, the SE Program Coordinator then forwards the referral to the SE Counselor in the appropriate MDRS district office for determination of VR services.

A large portion of the SE Counselor's job duties involves liaison activities among SE clients, family members, employers, and other service providers. SE staff members regularly attend joint staffing's and Person Centered Planning meetings with third party service providers to ensure that SE services are provided to clients in a consistent, appropriate, continual, and ongoing nature from the time of the initial referral to supported employment into the extended support phase. These staffing's often include family members and employers as well as service providers. Person Centered Planning and the development of natural supports for individual clients are an integral part of the SE staff members' activities.

Upon completion of the time-limited supported employment services, the ongoing job skills training assistance and other necessary long-term support is transitioned to a third party, group, or individual through a Cooperative Agreement or Extended Services Support Plan Agreement. The primary provider of extended services is the DMH-Bureau of Intellectual and Developmental Disabilities through its network of local community service programs.

However, an increasing number of individuals and other community organizations are accepting this role. Employers are often willing to take on this responsibility and are encouraged to do so since it is the most natural arrangement for the client.

MDRS entered into 114 new Extended Service Support Plan Agreements from July 1, 2015 through December 31, 2017. These 114 new agreements are in addition to the agreements previously established and still ongoing.

WIOA increased the maximum amount of time for SE staff to provide time-limited supported employment services to 24 months. However, the rate of transitioning a client to extended services is dependent upon the needs of the individual, his/her family, the employer, the third party agency, and other involved individuals. Since SE staff members and the extended service provider will have been collaborating in the provision of SE services throughout an individual's vocational rehabilitation program, such transitions are normally smooth and do not cause job disruptions.

The Coordinator for the SE Program and the Coordinator for Transition and Youth Career Services will work together to ensure new policy is in place and the appropriate amount of funding is utilized for youth with the most significant disabilities.

### g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

### 1. VR services; and

WIOA specifically directs the VR program to work with employers to identify competitive integrated employment opportunities and career exploration opportunities in order to facilitate the provision of VR services, and transition services for youth with disabilities such as pre-

employment transition services. MDRS will handle this coordination with employers through its Office of Business Development Services.

The Office of Business Development (OBD) was established to recruit employers interested in hiring people with disabilities, promote job ready clients of both the VR Program and the VRB Program to employers, and provide a variety of services to employers. OBD staff, referred to as Business Representative, build employer relationships and develops career opportunities for individuals seeking competitive integrated employment. Business Reps. The point of contact to businesses for any assistance and support needed to hire and maintain employment.

Business Development Representatives are able to work with businesses to determine if any of the job seekers on VR caseloads that will be deemed Job Ready match the skills that are needed by businesses, allowing VR counselors to spend more time with clients who require intensive IPE development and career counseling.

The main services provided by the Business Rep. include the following:

- Train employers regarding employment of individuals with disabilities, disability awareness, requirements of the Americans With Disabilities Act, work incentives, and laws related to employment opportunities;
- Provide consultation, technical assistance, and support to employers on workplace accommodations and assistive technology;
- Provide resources and support through collaboration with community partners and employers; and,
- Provide employer recruitment services, job matching, hiring, and retention of qualified individuals with disabilities.

MDRS also works with employers to help youth with disabilities and students with disabilities have more opportunities, explore career interests, acquire workplace skills, and enter into competitive integrated employment.

(2) Transition services, including pre-employment transition services, for students and youth with disabilities.

OBD staff work with students with disabilities and employers to place students in work experiences to assist them in learning about careers, opportunities and obtain work experience. MDRS has sponsored a summer internship program in which students participate in during the summer of 2016 and 2017. MDRS is on target to sponsor students in the 2018 Summer Internship program. This program also consists of students with physical disabilities, cognitive disabilities, blindness, deafness and other hearing impairments.

### MDRS Community Rehabilitation Program Services to Business

### The Addie McBryde Center for the Blind

The Addie McBryde Center is the state comprehensive center for the Blind and Visually Impaired. This center is a place where people who are blind can reside temporarily while they learn to lead productive, self-sufficient lives. The program incorporates instruction in a variety of

independence skills as well as case management including home management, cooking, orientation and mobility, Braille, access to computer technology, college preparation, job readiness, adaptation to blindness and many other skills that contribute to independence and the confidence to seek the highest level of employment possible. The center provides Pre-ETS in conjunction with the independent skills classes on a daily basis. The Summer Internship Program is hosted by the Addie McBryde Center that connects clients with their first real world work experience.

### AbilityWorks (AW)

AbilityWorks enables VR program staff and employers to work together to identify career exploration opportunities and competitive integrated employment opportunities for clients. Both activities are conducted mainly through Community Based Services that connects client abilities with employer opportunities.

AW considers career exploration as a comprehensive process that systematically utilizes work, either real or simulated, as the focal point for evaluation and vocational exploration, the purpose of which is to assist an individual with vocational development.

When a client has an interest in a career but AW cannot provide the client with similar tasks or experiences related to that career, then the AW staff establishes a Work based learning opportunity in the community for the client.

The client gains exposure to and experience in the type of career in which he/she is interested, thereby either helping the client realize the career is not the right choice or reaffirming the client's interest in the career.

The Work Based Learning Experience may additionally help the client and the VR Counselor understand what additional training is required as well as the skills and/or abilities that must be acquired to be successful in the selected career.

There are 15 Ability Works located throughout the state.

Through its AbilityWorks program, MDRS-VR partnered with the Sephora to provide training for individuals with disabilities in a warehouse distribution setting. This program began at Sephora's Olive Branch Sephora location August 2017.

### 2. transition services, including pre-employment transition services, for students and youth with disabilities.

Please see the section above.

### h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### 1. the State Medicaid plan under title XIX of the Social Security Act;

MDRS has entered into formal cooperative agreements with the Mississippi Division of Medicaid (Medicaid) and DMH-Bureau of Intellectual and Developmental Disabilities, with

respect to delivery of VR services, including extended services, for individuals with the most significant disabilities eligible for home and community-based services. The collaboration with DMH has resulted in a formalized referral process between the two agencies to ensure an array of services is provided to individuals with the most significant disabilities, opening up many new options for them.

In addition to the formal agreements with Medicaid and DMH, MDRS collaborates on a more informal basis with public and private entities to ensure a comprehensive program of services is provided to individuals eligible for supported employment services. Collaborative partners include local mental health facilities, Medicaid's Bridge to Independence Program to help people move from qualified institutions to homes in the community, local school districts, businesses and industries, local projects funded by the Mississippi Council on Development Disabilities (DD Council), workforce development one-stop career centers, advocacy groups, and other relevant third parties as well as parents of individuals with the most significant disabilities.

MDRS also has in place with the Mississippi Partnership for Employment a Memorandum of Understanding that includes the following partners:

- 1) DD Council;
- 2) The University of Southern Mississippi Institute for Disability Studies;
- 3) Disability Rights of Mississippi;
- 4) Mississippi Department of Education;
- 5) DMH:
- 6) Mississippi Department of Employment Security (the administering authority for the state's workforce development system); and
- 7) Two self-advocates

The partnership's intent is to build capacity across existing state systems to improve outcomes for youth and young adults with developmental disabilities including intellectual disabilities seeking competitive employment in integrated settings.

### 2. the State agency responsible for providing services for individuals with developmental disabilities; and

Please see the section above.

3. the State agency responsible for providing mental health services.

Please see the section above.

### i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. Data System on Personnel and Personnel Development

### A. Qualified Personnel Needs.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category; Assurance of an adequate supply of qualified Rehabilitation professionals and paraprofessionals and personnel is the major driving force for the Mississippi Vocational Rehabilitation Human Resource Development Section. Data from numerous sources is used to determine current and projected needs, as well as, VR progress toward meeting them.

The table below includes VR personnel and turnover data for state fiscal year 2016-2017, a projected staffing requirements for the next five (5) years. It should be noted that positions are vacated for many reasons including termination, promotions, lateral position transfers and retirements. VR employs strategies to address turnover, as well as, develop and prepare staff for advancement opportunities.

The projected ratio is 129 counselors, 82 counselor assistants, 8 interpreters, 6 psychometrists, 26 evaluators, 47 work adjustment instructors, and 9 instructors at the center for the blind to

Job Title	<b>Total Positions</b>	Current Vacancies	Projected Vacancies over the next 5 years
Counselor	129	15	88
Counselor Assistant	82	19	45
Interpreters	8	4	6
Psychometrists	6	1	3
Evaluators	26	7	12
Work Adjustment Instructors	47	7	28
Instructors at the Center for the Blind	9	1	6

### 13,671 applicants and eligible individuals served.

The projected requirements to meet the staffing needs of MDRS customers for the next five years are 180 counselors and a 15% increase in counselor assistants. An added increase of one staff interpreter will be needed to insure quality services are provided in a timely manner.

Staffing needs Counselors that provide Transition and Youth Career Services remains consistent with overall Counselor staffing projections. When factoring in population growth, the projected five year staffing needs are slightly higher than noted above, and would require that VR be provided with additional FTEs.

Described in the following table is information from institutions of higher education in Mississippi that prepare vocational rehabilitation professionals, categorized by institution and type of program.

An annual survey of the state's two university graduate programs in rehabilitation counseling determine the number of students enrolled, projected graduation dates, and the total number expected to complete the requirements for national certification in rehabilitation counseling. These two graduate programs accredited by the Council on Rehabilitation Education (CORE), one at Mississippi State University and the other at Jackson State University (a Historically Black College or University), are the only graduate programs in rehabilitation counseling in Mississippi. Jackson State currently has 57 students enrolled in its program and 15 students earned a Master's Degree in Rehabilitation Counseling during the calendar year 2016. Mississippi State currently has 9 students enrolled in its Master's Program in Rehabilitation Counseling and 9 students earned a Master's Degree in this program in 2016.

### **Program Data for Institutions of Higher Education**

Institutions	Students Enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
Jackson State University	57	3	6	15
Mississippi State University	9	0	9	4

### Plan for Recruitment, Preparation and Retention of Qualified Personnel.

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

VR maintains close relationships with universities including minority institutions such as historically black colleges and universities and disability specific organizations. VR employees collaborate with universities in securing grant funding, invite university employees to help with providing training and education activities and provide practicum and internship slots for students. VR acknowledges that it will not be able to recruit an adequate number of qualified rehabilitation counselors to replace those retiring and departing for other reasons. VR is currently engaged in the activities indicated below to address recruitment preparation and retention of counselors.

The VR Services Portion of the Combined State Plan continues to address the need to recruit and retain qualified staff, including those staff with minority backgrounds and individuals with disabilities. MDRS encouragesmanagers seeking to hire new counselors to hire only those individuals who meet the requirements of Comprehensive System of Personnel Development

(CSPD). If a manager determines that there is not a *qualified* rehabilitation professional available to fill a vacancy, the vacancy may be filled by an individual with lesser qualifications as long as the individual meets the national standards for a vocational rehabilitation counselor.

MDRS works closely with the graduate program in rehabilitation counseling at both Mississippi State University and Jackson State University by establishing placement opportunities for intern and practicum students and actively participating in university career development activities, including participation in Career Days and Job Fairs. Representatives from MDRS meet with the graduate students from each program annually to explain career opportunities and the state employment application process. A VR Coordinator also serves on each program's Advisory Council. Working with Jackson State University provides significant opportunities for recruitment of minorities, and MDRS works closely with university support services on both campuses to recruit graduates with disabilities.

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Please see the section above.

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Please see the section above.

### **B. Personnel Development**

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Please see the section above.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

Please see the section above.

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Please see the section above.

### 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit,

prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Please see section above.

#### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

In order to ensure that staff maintain a 21st century knowledge for working with individuals with disabilities, The Core Curriculum series will be provided annually for all vocational rehabilitation counselors and vocational evaluators.

This training program which provides a structured introduction to the Mississippi Vocational Rehabilitation Program, presented at the State Office and/or via webinar in two to three day training sessions conducted over the course of a year. It includes modules on the history and law affecting rehabilitation; program policies; medical and psychological aspects of disability; Accessible Automated Case Environment (the Agency's computerized case management system); counseling theories; job development and job placement; assistive technology; vocational assessment and various commercial evaluation systems utilized by the Agency's CRPs (for vocational evaluators); and training on disability-specific issues such as autism, blindness, deafness, etc.

There is not a state approved or recognized certification, licensure or registration of Vocational Rehabilitation Counselors. VR in conjunction with the State Rehabilitation Council establish the Certified Rehabilitation Counselor (CRC) educational eligibility requirement as its highest standard. Efforts are made to recruit those who meet the CRC educational eligibility status.

However, if MDRS is unsuccessful in finding enough applicants who meet the highest standards, MDRS will accept and considers qualified those who meet the minimum initial standard for providing Counseling and Guidance services, with an understanding of the needs of individuals with disabilities and a 21st century understanding of the evolving labor market.

The individual(s) must have Bachelor's degree from and accredited university and one year of experience counseling individuals with disabilities, with an understanding of the needs of individuals with disabilities and a 21st century understanding of the evolving labor market. Alternative majors may be considered such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, economics, or another field that reasonably prepares individuals to work with consumers and employers. Or

A Master's degree or doctoral degree in a field of student such as Vocational Rehabilitation counseling, law, social work, psychology, disability studies, business administration, human resources, special education, management, public administration, or another field that reasonably

provides competence in the employment sector, in a disability field, or in both business-related and rehabilitation-related fields and from an accredited university in a Social, Behavioral or Rehabilitative Science and substitute for the year of required experience.

In recent years, long-term strategies for the retraining vocational rehabilitation counselor or vocational evaluator who is not a qualified rehabilitation professional and not currently in a program are to utilize accessible Rehabilitation Services Administration (RSA) CSPD funded stipend programs to the extent possible, since it represents a significant savings to VR . VR has implemented this more aggressive approach in meeting the CSPD standards.

The previous in-service grant was allocated solely to VR CSPD activities. These training grant funds were used to pay tuition and fees to individuals who could not get the coursework through the RSA stipend program, such as those who did not live near the public university or who otherwise could not use the RSA Stipend program. The elimination of the in-service training grant to states has severely reduced VRs ability to continue support for these activities. It is not currently clear how much of the Basic VR grant will be available for this support. The HR department has implemented a system to track academic classes taken and progress toward certification eligibility.

Those not funded under a stipend program as funded by RSA CSPD will be sponsored by MDRS at available distance education or web-based Masters Programs in Rehabilitation Counseling such as those available through Auburn University, the University of Kentucky, the University of Wisconsin, Southern University, and the Georgia State University Consortium. Employees who live within commuting distance of Jackson State University and Mississippi State University can access these universities' campus-based programs.

Employees sponsored by the agency in graduate training are eligible for reimbursement of tuition, book costs, and approved educational leave. State statute requires that the employee enter a contractual agreement with MDRS for service repayment. MDRS requires three years of continued employment in return for expense reimbursement and educational leave. Additionally, MDRS has created a job classification for rehabilitation counselors which require certification as a professional rehabilitation counselor plus two years of rehabilitation counseling experience. Promotion to this highest of four counselor salary levels provides an additional incentive for personnel to obtain a Master's Degree and to attain certification. Upon attainment of the Master's Degree in Rehabilitation Counseling or certification in rehabilitation counseling, the employee may also be eligible for an educational salary benchmark of five percent.

The current salary for vocational rehabilitation counselors in Mississippi remains below that of other southeastern states. In State Fiscal Year 1999, MDRS was successful in its efforts to gain approval by the Mississippi State Legislature and the Mississippi State Personnel Board to raise the entry-level salary for counselors and evaluators in order to successfully attract *qualified* personnel. In January 2003, July 2006, and again in July 2007 the salaries of vocational rehabilitation counselors and vocational evaluators were also realigned. Following a survey of the southeastern average, the salaries remain lower than that of neighboring states. In December 2015, MDRS was successful in its efforts to gain approval by the Mississippi State Personnel Board to include a new classification for unselors and Evaluators possessing a CRC or CVE. This new classification increased the salary for qualified employees.

MDRS has established educational requirements of a Master's Degree in Rehabilitation Counseling with a continuing education component to address these issues.

B. the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

Please see section above.

### 4. Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

### A. System of staff development

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

MDRS has developed an ongoing training plan which provides training opportunities for all VR staff and appropriate VR support staff. The training is designed to meet the personal and career development needs of VR personnel, thus increasing retention among qualified personnel. The ongoing training plan for the VR Program includes four categories as provided below.

### Annual Core Curriculum Training Series:

New employee training begins with a program of orientation and basic training (Core Curriculum) for professional staff that includes the following:

- 1. History of Vocational Rehabilitation and the Foundations of Rehabilitation and the Law
- 2. Assistive Technology
- 3. Medical and Psychological Aspects of Disabilities
- 4. Job Placement
- 5. Job-Specific Automated Accessible Case Environment (AACE) Computer Training

This program is designed to return the agency to its mission of counseling, guiding and assisting individuals with disabilities find and maintain employment by refocusing on impediments to employment job readiness.

### New VR Counselor Training

New VR counselors also complete a structured and timely training at the local level. This training provides new staff task-specific training to promote quality service delivery to all VR consumers and promotes the timely performance of the counselor job duties. The training is completed in modules and includes instruction and hands-on training in overall case

management. This training, with an accompanying training manual, is designed for counselors to use as a guide in making decisions and delivering quality VR services to consumers.

### Annual Ongoing Staff Development Training Sessions

Although there has been an emphasis on assisting Counselors meet the CSPD standards and developing the technical, managerial and leadership skills of supervisors and managers, VR provides ongoing staff development training to employees at every level.

Ongoing staff development training can include a variety of topics but, generally, include the following:

- o Disability-Specific Topics
- o Case Management
- o Eligibility
- o Individualized Plan for Employment (IPE) Development
- o Various Types of Caseloads including Supported Employment and Transition
- o Issues Regarding Work with Minority Populations, including Cultural Diversity
- WIOA Pre-Employment Transition Services Customized Integrated Employment
- Other Areas Identified during Case Reviews conducted by MDRS Program Evaluation Staff

#### **Additional Training Based on Need**

VR offers individual training allocations for staff members. This allocation can be used for job related professional development activities such as attending conferences, purchasing books, CDs, DVDs or other materials, taking on-line short courses or any other approved professional development activity. Supervisory approval is required for these professional development activities to ensure that employees participate in activities consistent with their individual needs and job responsibilities and requirements. Our HR department provide consultation and technical assistance to VR employees as needed. Training sessions are held at the district level and in formal statewide training as needed.

In order to address the increasing percentage of retirement age employees and the need for knowledgeable managers and supervisors, the MDRS Executive Team established a formal leadership development program. This program, known as Leadership, Education, and Development for Rehabilitation Services (*LEADRS*), addresses the future loss of institutional memory and the transfer of accumulated wisdom through its development of employee management skills and technical competencies. *LEADRS*' mission is, "To educate, develop, and empower current and future leaders of MDRS to sustain and enhance the Department's holistic approach in meeting the needs of Mississippians with disabilities."

MDRS also promotes capacity building and leadership development through supervisory staff's participation in a Basic Supervisory Course and the Certified Public Manager Program available through the Mississippi State Personnel Board, and In-service Supervisor Training available through MDRS. In addition, staff members have participated in the National Executive

Leadership Program at the University of Oklahoma; the National Rehabilitation Leadership Institute at San Diego State University; the Community Rehabilitation Program Leadership Development Program and the Institute for New Supervisors through Georgia State University; the John C. Stennis State Executive Development Institute at Mississippi State University; and, the South Central Public Health Leadership Institute at the Tulane School of Public Health and Tropical Medicine.

The staff development plan is based upon the assessed needs of the staff. The Performance Development System (PDS) was developed by the Mississippi State Personnel Board in November 2010 to replace the previous Performance Appraisal System and is applicable to all state service employees.

Also incorporated into the employee evaluation process is the employee's Individual Development Plan (IDP), which serves as an employee training needs assessment. IDPs are developed by the employee and evaluated by the supervisor to assure that the employee receives work-related training and training in other areas that the employee and supervisor agree will benefit the employee's performance.

The system of employee performance evaluation does not impede the accomplishment of specific mandates contained in Title I of the Rehabilitation Act. The system facilitates accomplishment by means of including in performance standards the responsibilities of MDRS and its employees under the Rehabilitation Act.

Information from case reviews conducted by the MDRS Program Evaluation Unit is analyzed to evaluate the knowledge and skill of employees as they relate to the policy of serving individuals with the most severe disabilities. Results of such evaluations are included in the development of objectives for the annual VR training plan. Information from annual client surveys is also used in determining training objectives and is incorporated into the VR training plan.

### B. Acquisition and dissemination of significant knowledge

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

MDRS continues to identify current information from research, rehabilitation trends and professional resources. This information is provided to agency staff through a variety of methods, including training at the state, regional, and district levels. Most recently this training has been focused on Autism and customized employment. Additionally, this information is posted and available to staff on MDRS Connect, the agency intranet.

### 5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

VR staff need to work with Mississippi diverse populations. One way VR does this is to actively recruit and support employees who have diverse backgrounds. When a counselor is unable to communicate directly with a customer in his/her preferred language, the agency has qualified interpreters or translators on staff. Due to the increasing Hispanic population, employees who are fluent in Spanish have been identified and are available to serve as interpreters. Also, MDRS has

established fees for foreign language interpreters which may be authorized and paid by counselors when the need for their services occurs to provide rehabilitation services to non-English speaking individuals. American Sign Language interpretation needs who are deaf or deaf-blind are met using a combination of employee positions and arrangement with qualified local interpreter service providers. MDRS employs eight qualified sign language interpreters for the 10 districts that comprise the Office of Vocational Rehabilitation. The Office on Deaf and Hard of Hearing also employs one qualified sign language interpreter who is available to provide interpreter services. When either staff of local interpreters are not available, VR will rescheduled appointments of use available text communication devices with customers. VR has assisted listening devices in most offices for MDRS employees to communicate with individuals are hard of hearing or late-deafened and do not know sign language. VR complies with the Americans with Disability Act by providing materials in braille or large print, through having qualified sign language interpreters, and offering text-based communication access. VR arranges for Foreign Language Translators when needed.

VRB counselors participate in specialized in-service quarterly training and in-service training provided through the MDRS Assistive Technology Division which includes training on communication skills for individuals who are blind or deaf-blind. MDRS requires that all VR Counselors for the Deaf achieve and maintain basic proficiency in American Sign Language. VR coordinates with post-secondary educational consortiums to provide proficiency testing of manual communication skills. Specialized training in deafness-related areas is provided for new counselors in the Deaf Program as well as quarterly training for all VR Counselors for the Deaf and Sign Language Interpreters.

### 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

MDRS pursues efforts to coordinate cross training with MDE that will address education and rehabilitation under the provision of the Individuals with Disabilities Education Act. Training conferences on transition services have been held and co-sponsored by MDRS and MDE. Specifically, regional training conferences bring together all VR counselors with transition caseloads, other agency personnel involved with transition services, and transition specialists, teachers, and special education coordinators from MDE. VR strives to help MDE to meet the mandate the Individuals with Disabilities Education Improvement Act of 2004.

### VR support includes:

- Offering an early VR referral and application at age 14
- VR Transition Liaison contact list
- VR Transition Brochures and coordination of the Individual Education Plan with the Individualized Plan for Employment when served by both agencies
- VR counselors continue to attend regular in-service training that specifically targets transition youth issues and helps meet the requirements of the CSPD.

 VR and community partners continue to make presentations and participate in annual transition conferences at the national, state and local level to better serve students with disabilities.

These events allow for agency updates, contributing information on promising initiatives and sharing evidence based practices. When VR employees and local educators are assigned to teams at events, they use this time to discuss issues and learn from one another about effect transition practices. This information is often incorporated into VR staff trainings

VR offers a statewide transition training that is provided on a yearly basis. New
counselors receive this training which includes resources from the VR Transition
Coordinator. The VR Transition Manual and Best Practices is a training tool for VR
Transition teams to assure statewide consistency in coordinating services to students with
disabilities. VR employees have access to this manual on MDRS Connect (internal
website).

At the local level, VR employees participate in interagency groups with a transition focus to improve local coordination and services to students, families, schools, employers and agency partners.

### j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. with the most significant disabilities, including their need for supported employment services;

In review of the population in Mississippi relative to race/ethnicity and disability, the following statistics were identified (reference 2016 U.S. Census):

#### Based on US Census 2016 ACS

Race/Ethnicity	TOTAL	WITH DISABILITY	% TO POPULATION TOTAL OF INDIVIDUALS WITH DISABILITIES
White	1,716,181	295,963	17.2%
Black or African American	1,106,549	166,959	15.1%
American Indian and Alaska Native	12,975	2,355	18.2%
Asian	26,056	1,270	4.9%

### Based on US Census 2016 ACS

TOTAL	2,943,026	474,796	16.1%
Hispanic or Latino (of any race)	81,265	8,249	10.2%
Native Hawaiian and other pacific Islander	*	*	*

### 2018 Comprehensive Needs Assessment

The Office of Vocational Rehabilitation (OVR) and the Office of Vocational Rehabilitation for the Blind (OVRB) utilize several mechanisms for identifying the needs of individuals with disabilities. OVR and OVRB have completed the 2018 Comprehensive Needs Assessment.

The results are as follows:

### Survey Results:

### **Individuals with Significant Disabilities**

83.33% of the respondents identified themselves as an individual with a disability with the remaining percentage identifying as a family member of a person with a disability or as "other".

### Race and Ethnicity:

50.54% African-American

44.09% White

5.38% American Indian or Alaskan Native or "did not wish to self-identify".

The least amount (3.23%) indicated 'Hispanic'.

### **Disability Information**

Answer Choices	Response %	Responses
Blindness	3.76%	7
Visual Impairments	3.99%	13
Legal Blindness	2.69%	5
Deafness	7.53%	14
Hearing Loss	29.57%	55
Deaf/Blind	1.08%	2
Communication Impairments	5.91%	11

Answer Choices	Response %	Res	sponses	
Mobility Impairments	17.20%	32		
Orthopedic Impairments	6.45%	12		
Neurological Impairments	10.22%	19		
Respiratory Impairments	1.61%	3		
Other Physical Impairments	22.04%	41		
Intellectual Impairments	9.14%	17		
Mental Health Impairments	14.52%	27		
<b>Level of Education</b>				
No formal schooling			0.54%	1
Disenrollment			1.61%	3
Special Educational Certificate			4.84%	9
Elementary Education (Grades 1-8)			5.38%	10
High School Graduate or Equivalen	t Certificate		41.40%	77
Vocational/Technical License			3.76%	7
Associate's Degree			10.75%	20
Bachelor's Degree			21.51%	40
Master's Degree			9.14%	17
Doctorate Degree			1.08%	2
Answered 186/ Skipped 0				

Furthermore, realizing it's crucial for counselors to understand what clients believe to be most helpful and what they perceive to be the greatest obstacles in regards to gaining and retaining employment, the agency developed survey questions and implemented a statewide survey to capture this data.

A.with the most significant disabilities, including their need for supported employment (SE) services;

### Most Significant Disabilities including Supported Employment

- Of those who responded to the survey, 25% indicated they received SE services.
- 94.87% of those identified as SE participants stated they were receiving all the services they required.

• 97.44% of the respondents professed the SE staff showed respect, kindness, patience, professionalism and proficient knowledge of the SE program during service delivery.

### Service Needs Identified:

- Keep more work
- Offer more classes on completing applications
- Teach money management skills
- Communication skills training
- Computer skills training
- Transportation
- Additional specialized job development and job retention services
- Counseling on identifying natural support resources within the community and building the support network necessary to maintain long-term employment.
- Increased Supported Employment training provided to staff and providers on job retention strategies for clients.

Individualized advocacy focused on increasing success in competitive integrated employment settings.

### B. who are minorities;

MDRS continues to monitor access and services provided to minorities with disabilities who are unserved and underserved by VR.

MDRS has increased the outreach activities to assist in creating awareness of available services to meet their needs.

Based on the FFY 2018 Comprehensive Statewide Needs Assessment Survey, in regards to race and ethnicity, the results are as follows:

- African American 50.54%
- American Indian 5.38%
- Hispanic 3.23%

### Based on AACE - VR Case Management System

Race/Ethnicity	TOTAL	% With Disability
White	7561	56.3%
Black or African American	5799	43.17%

#### Based on AACE - VR Case Management System

TOTAL	13820	16.1%
Hispanic or Latino (of any race)	130	.97%
Native Hawaiian and other pacific Islander	30	.22%
Asian	50	.37%
American Indian and Alaska Native	247	1.83%

#### Service Needs:

- In order to understand the purpose of vocational rehabilitation in terms of health related issues/disabilities, information that is verbally communicated through social media and information written in their native language would provide a better understanding of available VR services.
- Increase collaboration with the Choctaw Indian Vocational Rehabilitation entity to target services that are not provided by Choctaw VR to assist in increasing employment in the community.
- Provide better access to information to develop training and training opportunities for individuals who are Hispanic and Latino
- Increase outreach to potentially eligible individuals in the Asian, Hispanic and Latino communities.
- Need 'VR Counseling and Guidance' training to assist in obtaining access to services that will provide support in employment with competitive wages.

MDRS will conduct a separate needs assessment for the Hispanic/Latino population in Mississippi with disabilities to help gather more information regarding their vocational rehabilitation service needs.

MDRS will continue to monitor the ACS survey for the most recent data regarding the race and ethnicity per county so our agency is informed of target areas in which information should be disseminated.

MDRS will also continue to provide outreach to other minority populations to ensure they have information regarding the VR program.

### C. who have been unserved or underserved by the VR program;

According to the 2016 American Community Survey, the following races and ethnicities were reported in the state for the state of Mississippi:

#### Based on US Census 2016 ACS

Race/Ethnicity	Total	Number with Disability	% TO POPULATION TOTAL OF INDIVIDUALS WITH DISABILITIES
White	1,716,181	295,963	17.20%
Black or African American	1,106,549	166,959	15.10%
American Indian and Alaska Native	12,975	2,355	18.20%
Asian	26,056	1,270	4.90%
Native Hawaiian and other pacific Islander	*	*	*
Hispanic or Latino (of any race)	81,265	8,249	10.20%
TOTAL	2,943,026	474,796	16.10%

Based on a review of the individuals served reported in AACE - VR Case Management System 10/01/16 - 09/30/17 the following individuals were served:

### Based on AACE - VR Case Management System

Race/Ethnicity	TOTAL	% With Disability
White	7561	54.70%
Black or African American	5799	41.90%
American Indian and Alaska Native	247	1.79%
Asian	50	< 1%
Native Hawaiian and other pacific Islander	30	< 1
Hispanic or Latino (of any race)	130	< 1%
TOTAL	13817	100%

In 2017, the agency served 6256 in the VR and VRB program. The federal requirement for service rate of all individuals with disabilities is 0.80. Based Standard and Indicator 2.1, Ratio of Minority Service Rate to Non-Minority Service Rate is 0.804. VR and VRB will continue to monitor the ratio of minority service rate to non-minority service rate to ensure that we are meeting the needs of individuals with disabilities in the state that are underserved and unserved.

VR and VRB collaborate with minority businesses and services providers that are located in the community in order to develop relationships that lead to employment.

The interagency agreement between MDRS and the Mississippi Band of Choctaw Indians is maintained. Both agencies work together to help ensure that eligible Choctaw Indians services are coordinated in order to provide comprehensive VR services that will lead to employment outcomes.

Based on information from the 2016 American Community Survey, the following types of disabilities in the state are:

#### Based on US Census 2016 ACS

Disability Types	Number of Individuals	Percent with a Disability
Ambulatory	267,388	9.80%
Cognitive	189,526	6.90%
Hearing	117,227	4.00%
Vision	97,345	3.30%
TOTAL OF INDIVIDUALS with Disability	671,486	

Based on AACE - VR Case Management System for 2017, the following type of disabilities were served:

Primary Disability Impairment	Number	Percentage
Blindness	85	0.65
Cognitive impairments	1927	14.76
Combination of Orthopedic/Neurological Impairments	233	1.78
Communicative impairments (expressive/receptive)	45	0.34
Deaf-Blindness	2	0.01
Deafness, communication auditory	130	0.99
Deafness, communication visual	175	1.34
Dexterity Orthopedic/Neurological Impairments	5	0.03
General physical debilitation	105	0.8
Hearing loss, communication auditory	2535	19.42
Hearing loss, communication visual	43	0.32

Primary Disability Impairment	Number	Percentage
Legally Blind (excluding totally blind)	106	0.81
Manipulation Orthopedic/Neurological Impairments	102	0.78
Mobility Orthopedic/Neurological Impairments	516	3.95
Other Hearing Impairments	153	1.17
Other mental impairments	2089	16.01
Other orthopedic impairments	541	4.14
Other physical impairments not listed elsewhere	2482	19
Other visual impairments	1167	19.02
Psychosocial impairments	543	4.16
Respiratory impairments	63	0.48

Based on the Comprehensive Needs Assessment and other data received from VR Case Management System, individuals with Mental Illness, Cognitive Disabilities and Autism Spectrum Disorders are the primary emerging population that are reported as underserved and who staff has requested the most assistance in understanding the disability in terms of employment. VR will seek to provide more training and resources to assist staff in serving this population.

### VR Service Needs Identified and Percentage:

- Vocational Rehabilitation Counseling and Guidance 22.04%
- On-the-Job Training 20.43%
- Job Search/Placement Services 18.28%
- Vocational Assessment/Evaluation and Transportation 14.54%
- Training: College/Vocational 10.00%
- Attendant Care 66.67%
- Transportation 20.69%
- Job or vocational training 18.52%
- Information and Referral Services 9%
- Work Adjustment Services- 9%
- Customized Employment 9%
- Job Coaching Services 8%
- Mental Health Treatment/Counseling 8%

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- Social Security Benefits Counseling 7%
- Independent Living Skills 6%
- Other Services Needed 6%
- Durable Medical Equipment 6%
- Medical Services 6%
- Child Care Services 4%
- Rehabilitation Technology (DME/home/Vehicle or Job site modification) 4%
- Maintenance 4%
- Family and Caregiver Support 3%
- Personal Care Attendant (PCA) 3%
- Interpreter Services 2%
- Note Taker 1%
- Reader Services 1%

### D. who have been served through other components of the statewide workforce development system; and

As part of the comprehensive needs assessment, a survey question asked participants if they have ever used the state's workforce investment network for help in finding a job or for receiving job training services. Of those respondents who identified themselves as an individual with a disability, 41% responded "yes" to the question. Of that 41%, approximately 71% reported receiving job search assistance.

VR will increase partnerships with the statewide workforce investment system to develop innovative programs to serve common customers. With our collaboration and integration efforts thus far we have been successful in implementing a common intake process, anticipating in having a HUB where are workforce partners can access information for common clients and all VR clients have the Workforce ID which is consistent throughout all programs.

VR will continue to participate and assist in providing oongoing training of job center staff on disability sensitivity issues.

Continued efforts to coordinate the efforts of different government agencies with very different rules and expectations for participation. An individual facing parenting responsibilities, poverty, and disability issues needs to work with agencies that can coordinate their efforts.

E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

#### Youth and Students with Disabilities

OVR/OVRB conducted a comprehensive needs assessment of students and youth with disabilities, ages 14-24, to determine the rehabilitation needs, including the need for preemployment transition services (Pre-ETS), of this population. A total of 132 individuals in this

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age group responded with the greatest number residing in Hinds, Madison, Jackson, Lauderdale and Bolivar counties.

#### Transition Responses - Disability Selected - 132 Respondents

Intellectual Impairments 39%

Mental Health Impairments 15%

Deafness 12%

Neurological Impairments 11%

Other Physical Impairments 9%

Hearing Loss 8%

Communication Impairments 6%

Mobility Impairments 6%

Visual Impairments 5%

Deaf/Blind 4%

Respiratory Impairments 2%

Blindness 2%

Legal Blindness 2%

Orthopedic Impairments 2%

#### Age Range

- 13.64% age 22-24
- 42.42% age 19-21
- 43.94% age 16-18
- There were no responses from individuals 14-15 years old.

#### Gender

- 56% male
- 44% female

#### Race/Ethnicity

- 2.27% American Indian or Native Alaskan
- .76% Asian
- 76.52% Black or African American
- 18.94% White
- 3.03% Multiple races

#### 1.52% - Other

#### **Education Level**

60.61% of respondents were in the 11th -12th grade.

#### **Pre-Employment Transition Services (Pre-ETS)**

In July 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law. WIOA requires a vocational rehabilitation (VR) agency to reserve at least fifteen percent (15%) of their federal funds to make available, in coordination with local education agencies, the provision of pre-employment transition services (Pre-ETS) to students with disabilities statewide who are eligible or potentially eligible in accordance with Section 361.48 of the federal regulations and 113 of the Rehabilitation Act of 1973, as amended.

Pre-ETS are specific services that are only available to students with disabilities to ensure they have meaningful opportunities to receive training and other services necessary to achieve employment outcomes in competitive integrated employment. These services are designed to help students with disabilities begin to identify career interests that can be explored further through additional OVR/OVRB transition services.

Pre-ETS services are made available by the counselor to all eligible and potentially eligible students with disabilities.

This survey assessed the need for the provision of Pre-ETS for students with disabilities in the state of Mississippi. Results are as follows:

PRE-ETS Services	Received Pre- ETS	Never - ReceivedPre- ETS	Interested in ReceivingPre- ETS	Not Interested in Receiving Pre- ETS
Job Exploration Counseling	53.79%	46.21%	70.45%	29.55%
Work-Based Learning Experiences	54.55%	46.97%	70.45%	29.55%
Workplace Readiness Training	48.48%	51.52%	62.88%	37.12%
Instruction in Self-Advocacy	60.61%	39.39%	65.15%	34.85%
Counseling on Post-Secondary Educational Opportunities	53.79%	46.97%	68.64%	31.36%

#### **Employment Plans for Students**

In order to determine the services that students in the State of Mississippi will need upon graduation from secondary and/or post-secondary education programs, their post-graduation plans were assessed. 33.33% of students indicated they would be employed full time upon graduation. 34.09% did not know their future employment plans. Less than 8% reported that this question was not applicable to them.

Survey results show that 100 respondents were not enrolled in school or college at the time of the survey. They reported:

- 34% planned to search for a job immediately;
- 29% did not know their plans at the time of the survey;
- 18% planned to re-enroll in a high school diploma or a GED program;
- 17% planned to enroll in a vocational or technical training program;
- 9% planned to enroll in academic college training;
- 7% planned to travel or move out of state; and
- 3% planned to stay at home.

In order to determine why an individual was not working, we asked the respondents to identify the reasons they were not working. The top five reasons are listed below:

- 46.21% Question not applicable them;
- 21.97% Lack of work experience;
- 18.94% Lack of transportation;
- 17.42% Lack of jobs in the community (tied with)
- 17.42% Other reasons.

It is important that individuals receive services to meet their individualized needs to ensure they have the greatest opportunity to achieve competitive integrated employment. Respondents indicated the following are the most needed services in helping them achieve employment:

- 45.45% Job Search/Placement Services
- 40.91% Vocational Rehabilitation Counseling and Guidance
- 33.33% Transportation
- 26.52% Job Coaching
- 22.73% No Other Services Required

# 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

In 2017, VR recognized the need establish and develop more relationships with providers/community rehabilitation programs to assist in providing pre-employment transition services. In 2017 and early 2018, Request for Proposals were advertised. In 2018, the agency is hoping to have developed more community rehabilitation programs to provide such services.

The Mississippi Department of Rehabilitation Services through the Office of Vocational Rehabilitation, operate 15 transitional rehabilitation community facilities referred to as AbilityWorks. In 2017, AbilityWorks restructured its services to be able to provide pre-

employment transition services such as work based learning opportunities and career/vocational exploration services.

MDRS also contracts with one-nonprofit entity - Goodwill Industries.

These facilities provide a variety of services including vocational evaluation, work adjustment training, and community based work experiences, counseling and transportation. All services are individualized to meet the needs of the individual served to prepare him/her for competitive integrated employment

3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

The 340 respondents consisted of potentially eligible students with a disability, VR eligible transition secondary and post-secondary students, transition out of school youth, and parents of transition students from all four regions of the state.

To effectively meet the needs of students, MDRScollaborates with education and workforce programs to assist students with disabilities in making the transition from school to post-secondary education and/or to competitive integrated employment. MDRS, through its Offices of Vocational Rehabilitation (OVR) and Vocational Rehabilitation for the Blind (OVRB), maintains a Memorandum of Understanding (MOU) with the Mississippi Department of Education (MDE).

In addition to the MOU with MDE, the Agency maintains individualized agreements between the local school districts and vocational rehabilitation offices. These agreements define referral procedures and the roles of the school and OVR/OVRB staff in the provision of transition services that are specific and tailored to the unique situation of each school and OVR/OVRB district. Each counselor is responsible for developing and maintaining an agreement between the Agency and local school district. A copy of the form to be used for this agreement may be obtained from the State Coordinator for Transition Services. The form includes instructions and has been designed to assist in the development of the agreements locally.

A counselor is assigned to work with a specific school district to provide transition services in accordance with the Rehabilitation Act of 1973, as amended, the Carl D. Perkins Vocational and Applied Technology Act, as amended and the Individuals with Disabilities Education Act (IDEA), as amended.

VR assures that the individualized plan for employment (IPE) is also coordinated with the employment goal in the school's individualized educational plan (IEP) and, where appropriate, the (ISP) individualized service plans of the long term care providers.

The VR Counselor servicing local school districts as well as the VR Supported Employment Counselors work together with schools district to ensure that students with disabilities that previously entered subminimum wage employment are provided information and services to assist in diverting these individuals into competitive integrated employment.

VR facilitates the opening of cases for beginning at age 14 if required. Pre-ETS services are provided to students with disabilities as early as age 14. If these individuals require VR

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Transition services as early as age 14, VR facilities this need by opening a VR case. This service provision will help strengthen VRs efforts to reach more students and strengthens the opportunity for successful employment outcomes.

In accordance with the Rehabilitation Act of 1973, as amended, the inclusion of transition services is not intended to shift the responsibility from school districts to vocational rehabilitation (VR), but enforces the need for coordinated efforts between education and workforce programs such as VR.

MDRS, through its OVR/OVRB, is the state agency that delivers transition services to secondary school students with disabilities. These counselors work with students, families, and educators during the transition process to inform them of available VR services, including pre-employment transition services (Pre-ETS), and identify students who might benefit from or need VR services and career services designed to assist in obtaining a post school employment outcome.

While local school districts are responsible for providing education and transition services to students with disabilities who are still in the secondary school system, under WIOA, VR is the state unit that is mandated to make available Pre-ETS begin at age fourteen (14) for all eligible and potentially eligible students with disabilities with parental consent.

District Managers and counselors are responsible for developing cooperative working relationships with the local education agency staff in the districts, and other agencies working with youth. Letters were sent by the State Transition Program Coordinator to all the Special Education Directors and 504 Coordinators for each school district to discuss VR services for students with IEPs and 504 plans. The counselor is to follow-up with their Special Education Directors and 504 Coordinators at least annually to discuss the provision of outreach services for students with disabilities and to determine the need for potential referrals.

Counselors are assigned to all public secondary schools. The counselor and the District Manager establish linkages within each school with the following individuals:

- 1. Special Education Coordinator;
- 2. 504 Coordinator;
- 3. Transition Coordinator
- 4. Principal
- 5. Guidance Counselors for grades 8th through 12th;
- 6. School health personnel; and
- 7. Other school-based staff determined appropriate by the counselor and the District Manager.

The counselor works with the school district's Transition Coordinator, Transition Assistants when applicable, and Special Education Teachers to implement Pre-Employment Transition Services (Pre-ETS) for eligible and potentially eligible students with disabilities. The required activities of Pre-ETS will mostly take place at the local school during a prearranged time that the counselor and school personnel have agreed to.

The counselor will be prepared to teach the Pre-ETS curriculum and will do so as agreed upon with school personnel. In addition to being prepared to teach the curriculum, the counselor will provide the classroom teacher with technical assistance and/or curriculum materials as needed. The counselor should be working in his/her assigned schools two to three days per week while rotating schools to ensure services are made available to both eligible and potentially eligible students in each school serviced.

The counselor documents the student's progress in Pre-ETS activity for eligible students in the participant's AACE Case note page and for potentially eligible (PE) students in the AACE PE Case Type page, and provide an update to the classroom teacher with a report of the student's participation and progress in Pre-ETS on a regular basis.

MDRS and the local school district may enter into a Cooperative Agreement to jointly fund a Transition Assistant position to ensure a smoother transition of services between the school and OVR/OVRB. The Transition Assistant will provide services to selected secondary students with disabilities who are: (a) between the ages of fourteen (14) and twenty-one (21), (b) in transition from school to work and community, and (c) eligible for vocational rehabilitation services. The addition of school-based transition services are intended to add a component to the overall school and rehabilitation service continuum, not supplant existing employment-related or other services which are potentially appropriate for a particular student (any service the school is already responsible for providing). The Transition Assistant will not serve students who, with or without modifications, can benefit from existing school programs (career/technical and educational training programs etc.).

Once the student leaves the school system, it becomes the full responsibility of the agency counselor to continue to provide services necessary to further prepare the individual for a successful post-school outcome by enrolling in a post-secondary education program or obtaining competitive integrated employment.

#### k. Annual Estimates

Describe:

#### 1. The number of individuals in the State who are eligible for services;

The Mississippi Department of Rehabilitation Services has provided below estimates and projections for FFY 2018 (October 1, 2017 through September 30, 2018).

The Mississippi Disability Data Table from the 2016 American Community Survey (ACS) indicates that 258,824 Mississippians of working age (18-64) have a disability. Of this total, 76,078 or 29.39% are employed. Based on this data and number served from previous years it is estimated that 6% of 182,746 Mississippians of working age who are not working and have a disability could potentially be eligible for VR services if they applied.

Based on the trend analysis using actual numbers from FY 2012 to FY 2016, the number of individuals determined eligible to receive VR services decreased.

Prior to implementation of WIOA, caseloads were restructured in order to have more counselors that worked with students and youth. During this period of restructuring, current caseload sizes were reviewed to determine the need to assist counselors with existing cases that were not

progressing through the rehabilitation process and to determine cases that were not longer interested in pursuing competitive integrated employment. As a result, cases were closed without obtaining an employment outcome. In the overall numbers served, the closing of these existing cases created a substantial decrease in the overall numbers served.

However, looking at numbers served from FY 2017 and the current number of referrals plus the increased number of referrals for students and youth with disabilities we estimate a 3% increase in the number determined eligible for FY 2017, FY 2018 and FY 2019.

Despite this decrease, MDRS estimates that 12,395 individuals will be served under the Title I part B and Title VI for the period beginning October 1, 2017 to September 30, 2018.

Based on the current number served, the current number of referrals and the anticipated number of individuals with disabilities who are adults, students and youth that will pursue VR services, we anticipate at least a 3% increase in the overall numbers served for 2018 and 2019.

TABLE 2.A.2

Fiscal Year (FY)	Number VR Served	% of Change from Previous Year
FY 2017	12,034	3% Increase
FY 2018	12,395	3% Increase
FY 2019	12,767	3% Increase

#### Annual Estimates for the VR Supported Employment Program

MDRS estimates that 431 individuals will be served with Title VI - Supported Employment funds for the period from July 1, 2017 to June 30, 2018. This estimate is based on a trend analysis using previous year numbers, FY 2012 to FY 2016 of Supported Employment consumers served. As with VR Title 1 B above, we anticipate the current numbers served for Title VI Supported Employment FY 2017, the current number of referrals and anticipated number of referrals to be served by Supported Employment Counselors will increase for FY 2018 and 2019.

Fiscal Year (FY)	Number Served SE Served	% of Change from Previous Year
FY 2017	431	10% Increase
FY 2018	521	10% Increase
FY 2019	573	10% Increase

#### 2. The number of eligible individuals who will receive services under:

#### A. The VR Program;

Please see the section above.

#### B. The Supported Employment Program; and

See section above.

#### C. each priority category, if under an order of selection;

MDRS estimates that 12,395 (10,870 in Title I Part B and 1,525 in Title VI) individuals with disabilities will be eligible to receive services in the following categories

The estimated number for service and outcome goals by OOS priority categories for July 1, 2017 ending June 30, 2018, is listed below:

Priority Category	Number of Individuals Served	Time within Goals are to be achieved	Cost of Services
1	3966	10/01/2017 to 09/30/2018	\$13,818,019.90
2	4958	10/01/2017 to 09/30/2018	\$16,599,830.22
3	3471	10/01/2017 to 09/30/2018	\$10,347,814.62
p.	Total 12,395	9	\$40,765,664.76

# 3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

See table above

The total projected available resources including the federal allotment, non-federal contributions, carryover, and program income for 2017 is \$70,735,555. Based on this projection and the estimates provided above, MDRS will be able to provide the full range of VR services to all eligible individuals in the state. Therefore, if MDRS determines that resources and funds are not available MDRS may implement an Order of Selection (OOS) in 2017 with Priority Category 3 being the first category to close if necessary.

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

See table above

#### **l. State Goals and Priorities**

The designated State unit must:

1. Identify if the goals and priorities were jointly developed

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

Through outreach, education and marketing efforts targeted to individuals with disabilities, VR/VRB will continue to broaden the population of individuals with disabilities being served. VR/VRB will continue to target individuals with disabilities who are already working to retain or progress in employment, previous VR/VRB consumers who may have lost employment to become reemployed, college students nearing completion of their academic programs, and:

- High school transition age youth with disabilities
- Individual with blindness and visual impairments
- Individuals with deafness and hearing impairments
- Youth and Adults with Most Significant Disabilities

#### **GOALS**

Goal 1: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities

Goal 2: Improve the VR Service Delivery System to individuals with disabilities

Goal 3: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments

Goal 4: Implement identified improvements to increase statewide consistency and quality of consumer services

# 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

The goals and priorities are listed separately for the Supported Employment Program. See Section (n) Goals and Plans for Distribution of Title VI funds.

## 3. Ensure that the goals and priorities are based on an analysis of the following areas:

Please see the section above.

#### A. The most recent comprehensive statewide assessment, including any updates;

The goals and priorities listed above were developed after an analysis of the comprehensive statewide needs assessment that the agency conducted in FFY 2015 and 2018.

The six primary performance indicators for the core programs were analyzed and incorporated into developing the goals and priorities.

The listed goals and priorities have been discussed with and are a result of conversations with the SRC, and findings and recommendations from monitoring activities conducted under Section 107, as applicable.

### B. the State's performance under the performance accountability measures of section 116 of WIOA; and

MDRS is still collecting baseline data for the performance measures under section 116 of WIOA. We have submitted RSA 911 for two quarters of the program year.

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

No additional recommendations or reports were received from the SRC.

#### m. Order of Selection

Describe:

- 1. Whether the designated State unit will implement and order of selection. If so, describe:
- A. The order to be followed in selecting eligible individuals to be provided VR services.

While it is the intent of the Mississippi Department of Rehabilitation Services (MDRS) to provide comprehensive vocational rehabilitation (VR) services to all eligible individuals who apply for services, often VR services cannot be provided to all eligible applications due to financial limitations. Federal Regulations require the establishment of an Order of Selection (OOS), if VR services cannot be provided to all eligible individuals who apply for VR services.

MDRS/OVR and OVRB has adopted an OOS which establishes a system of criteria for prioritizing individuals with disabilities to receive services. The OOS allows for individual with most significant disabilities to receive services before all other individuals with disabilities. Second priority shall be given to consumers with significant disabilities. Third priority will be given to other eligible consumers. The Order of Selection was implemented in May 2001. Since July 13, 2009, all priority categories have been open.

In 2015, VR updated its Order of Selection which was approved by the State Rehabilitation Council.

Priority Category 1: An individual has a Most Significant Disability if a mental or physical impairment exists that seriously limits three or more functional capacity areas in terms of an employment outcome and whose vocational rehabilitation will require multiple VR services over an extended period of time.

Priority Category 2: An individual has a Significant Disability if a mental or physical impairment exits that seriously limits two functional capacity areas in terms of an employment outcome and whose vocational rehabilitation will require multiple VR services over an extended period of time.

Priority Category 3: An individual has a Non-Significant Disability if a mental or physical impairment exits that seriously limits one functional capacity area in terms of an employment outcome and whose vocational rehabilitation will not require multiple VR services over an extended period of time.

The OOS does not discriminate against any eligible individual on the basis of gender, age, race, creed, color, religion, national origin, citizenship, type of disability, duration of residence in Mississippi, public assistance status, source of referral, expected employment outcome, need for specific services, anticipate cost of services required, or income level of an individual or his/her family.

MDRS in consultation with the SRC will close the Priority Categories designated to be closed. Any individual currently under an approved IPE at the time his/her priority category is closed will continue to receive with his/her IPE, including the provision of Pre-employment transition services and Post-Employment Services.

Individuals placed in delayed status will be notified of their priority category, process for reclassification, their right to appeal, and the availability of CAP.

If an OOS is implemented, MDRS will provide the following information:

- Show the order to be followed in selecting eligible individuals to be provided VR services
- Provide justification for the order
- Identify the services and outcome goals
- Identify the time within which these goals may be achieved for individuals in each priority category within the order

When an OOS is in effect, individuals meeting eligibility requirements but are in a closed priority category have access to information and referral services. VR will provide all eligible individuals with disabilities who do not meet the OOS criteria with information about, and referral to, other Federal or State programs (including to Workforce Investment Network Job Centers for training and placement) that can assist them with obtaining or retaining employment.

MDRS will elect to provide services, regardless of any established order of selection, to eligible individuals who require specific services or equipment to maintain employment.

#### **Detailed Priority Category Descriptions**

#### **Priority 1. Most Significant**

Individual With a Most Significant Disability: An individual —

- who has a severe physical or mental impairment that seriously limits three (3) or more functional capacities in the areas of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one or more physical or mental disabilities (as listed under an Individual with a Significant Disability) or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitation.

**Priority 2. Significant Disability** 

#### Individual With A Significant Disability: An individual

- who has a severe physical or mental impairment that seriously limits one or two
  functional capacities in the areas of mobility, communication, self-care, self-direction,
  interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, intellectual disability, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), spinal cord conditions (including paraplegia and quadriplegia), sickle cell anemia, specific learning disability, end-stage disease or other disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitation.

#### Priority 3. Non-Significant Disability

Individual with a Disability: An individual

- who has a physical or mental impairment that seriously limits one (1) functional capacity in the area of mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills in terms of an employment outcome;
- whose vocational rehabilitation is *not* expected to require multiple vocational rehabilitation services over an extended period of time; and
- who has one or more physical disabilities or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitation.
- Individuals having an active plan prior to the implementation of the Order of Selection will continue to receive services uninterrupted.

#### B. The justification for the order.

#### **Staff and Resources:**

MDRS has determined that sufficient resources are currently available to provide VR services to all individuals with disabilities that apply, those determined eligible in all priority categories and those under and IPE. Due to the increase in service needs and the staff resources in 2017 and 2018 to provide the services, if the projected resources for funds and personnel change before the next state plan modification, MDRS will make a determination whether it may need to close one or more of its priority categories.

During FF2018, MDRS will be able to serve all eligible individuals in all three priority categories. The total projected available resources including the federal allotment, non-federal contributions, carryover, and program income for FY 2018 is \$67,705,332. MDRS will conduct reviews periodically during the year to help validate the order and assess the impact of unforeseen circumstances.

When it is determined that MDRS does not have the resources to serve all eligible individuals in all priority categories, MDRS administration will make the decision to begin closing priority categories, first beginning with Priority Category 3, Non-Significant disability.

The estimated number for service and outcome goals by OOS priority categories for July 1, 2017 ending June 30, 2018, is listed below:

Priority Category	Number of Individuals Served	Time within Goals are to be achieved	Cost of Services
1	3966	10/01/2017 to 09/30/2018	\$13,818,019.90
2	4958	10/01/2017 to 09/30/2018	\$16,599,830.22
3	3471	10/01/2017 to 09/30/2018	\$10,347,814.62
	Total 12,395		\$40,765,664.76

The total projected available resources including the federal allotment, non-federal contributions, carryover, and program income for FY 2018 is \$67,705,332. Based on the projection above and the estimated funds for FY 2017 served above, MDRS will be able to provide the full range of VR services to all eligible individuals in the state. Therefore, MDRS is anticipating we will NOT have to implement an Order of Selection (OOS) in FY 2018.

#### C. The service and outcome goals.

See above

### D. The time within which these goals may be achieved for individuals in each priority category within the order.

All priority categories are currently open and there is no wait time for receipt of services for any category. The average length of time to receive services for each priority category is as follows: Priority Category 1: Most Significant Disability: 18 months; Priority Category 2: Significant Disability: 14 months and Priority Category 3: 8 months.

### E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

When an OOS is in effect, MDRS containues to accept applications and make determinations of eligibility while notifying all eligible individuals of the priority category they are assigned.

When an individual is assigned to a category that is closed, the individual will be placed in delayed status to be served in the chronological order in which he or she applied. Individuals having and active individualized plan for employment prior to the implementation of the OOS will continue to receive services uninterrupted.

2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

MDRS will elect to provide services, regardless of any established order of selection, to eligible individuals who require specific services or equipment to maintain employment.

- n. Goals and Plans for Distribution of title VI Funds.
- 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

In order to meet the expectations and intent of the Rehabilitation Act of 1973 as amended by WIOA and to achieve maximum utilization of available funds, certain priority areas are being emphasized by MDRS in the Supported Employment Program.

SE staff members continue to make every effort to identify and facilitate natural supports that occur in the workplace in order to maximize utilization of funds. These natural supports do not replace the one-on-one intensive support provided to clients by the SE Counselors. However, when properly identified and utilized, these natural supports do result in decreased direct service costs and increased quality of support.

(2) The SE Program will continue to emphasize individual employment placements. Other models will remain an option for clients and may be utilized when feasible. However, when given a choice, clients prefer individual placements by an overwhelming majority. Individual placement is the preferred option of MDRS as well as the clients because it achieves integration in the work environment, it is competitive integrated employment, and it provides more opportunities for career pathways and better quality jobs with more benefits.

©Person Centered Planning and Customized Employment as integral parts of service provision continue to be high priorities. These service approaches have been embraced by mental health providers, the DD Council, and other service providers in the state as accepted best practices for model service delivery.

#### Goals and priorities:

**Goal I**: Continue the referral process between MDRS and DMH to identify "youth with the most significant disabilities" who will require SE services. Increase the number of youth with most significant disabilities served by 10%.

**Goal II**: Continue the referral process between the VR Transition/Youth Counselor and the VR Supported Employment (SE) Counselor for students with disabilities ages 14-21 who have determined to need long term ongoing support services.

This process will assist in an overall increase in the number of students and youth that are provided SE Services.

Goal III: Provide training to all SE staff by a highly experienced professional in the area of customized employment.

**Goal IV**: Continued development of the Job Trainer Handbook by the SE Coordinator and focus group to train all Job Coaches. This handbook will be utilized across the state.

**Goal V**: Train all OVR Counselors including those who work with General VR consumers in Supported Employment.

# 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

#### A. the provision of extended services for a period not to exceed 4 years; and

VR also works with extended services providers, when feasible, as a means to provide additional resources and services to individuals needing and choosing these specialized services as an interim step to the rehabilitation process of achieving a successful employment outcome. SE Counselors will continue to primarily focus on successful employment outcomes in competitive integrated work settings.

B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Cooperative arrangements will continue to be developed with other provider agencies and organizations, both public and private, to expand the SE Program to unserved and underserved populations. The focus of these arrangements is on promoting and enabling SE Counselors and service provider personnel from other agencies to work as teams to share expertise, provide technical support in specific disability areas, and conduct joint training.

With the interagency agreement and referral process that has been developed with the Department of Mental Health and the Division of Intellectual and Developmental Disabilities, we will continue to work with this agency in serving individuals who are eligible for the waiver as extended service providers.

SE staff also participate in both practices in coordinating services for SE clients in the education system throughout the state. These practices have proven to be successful for clients because of the enhanced teamwork with other agencies. Under WIOA customized employment is included in the definition of supported employment and VR is including it as a VR service that the SE client can choose to include in his/her IPE. Therefore, VR is expanding customized employment training to the majority of its direct service staff. These service approaches will continue to be made available to clients during the intake process and will be utilized when deemed appropriate and when chosen by the client.

MDRS expects to continue supplementing Title VI funds as supplemental funds are available and, if possible, continue the level of Title I monies committed to the SE Program. MDRS occasionally supplements Title VI funds with Social Security Reimbursement funds as there is a need for additional funds for program expenditures. MDRS plans to continue this process when Title I funds are not available. Additionally, MDRS will continue its efforts to increase the funds available for use by the SE program by development and submission of proposals for grants that may become available. MDRS will also explore ways to utilize available funds more efficiently by entering into cooperative agreements with other entities who may participate in the cost of providing services to SE clients. It is anticipated that SE Counselors will utilize all of the Title VI allotment. In obtaining extended service providers, Supported Employment counselors will continue to work with individuals that may be eligible for the IDD Waiver program to be the extended service provider. This will assist in providing the services necessary to assist in

maintaining an individual with a significant disability in employment. MDRS currently has a referred process in place with the Department of Mental Health for individuals who are eligible for the IDD Waiver, but seek competitive integrated employment.

Under WIOA the new law requires that 50% of the allotment received under Title VI be used for provision of SE services, including extended services, to youth with the most significant disabilities (up to age 24), with administrative costs limited to 2.5% of the allotment.

These youth may receive extended services (i.e., ongoing supports to maintain an individual in supported employment) for up to four (4) years.

MDRS will invest all Title VI allocations to fund the purchase of job training services. The Coordinator for the SE Program and the Coordinator for Transition and Youth Career Services will work together to ensure new policy is in place and the appropriate amount of funding is utilized for youth with the most significant disabilities.

#### o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

## 1. The methods to be used to expand and improve services to individuals with disabilities.

The Mississippi Department of Rehabilitation Services, Office of Vocational Rehabilitation and Vocational Rehabilitation for the Blind in consultation with the State Rehabilitation Council, consumers and other stakeholders, continually assesses the vocational rehabilitation needs of Mississippians with disabilities and the success of VR in meeting these needs.

The strategic plan is a major component in the on-going program evaluation and planning in the implementation of the Rehabilitation Act of 1973, as amended by Title IVR of the Workforce Innovation and Opportunity Act.

The VR/VRB partnership within Mississippi's one-stop system is clarified through Memoranda of Understanding with the State and each of the four local workforce development areas. The partnership is further enhanced through a Memorandum of Understanding (MOU) with the Mississippi Department of Employment Security (MDES), the lead state workforce agency designated to disburse federal workforce funds and the main operator of the WIN Job Centers, to continually improve the lifestyle, acceptance and accessibility of persons with disabilities within Mississippi's WIN. These MOUs include language to provide for intercomponent staff training and technical assistance on availability of benefits and information on eligibility standards for VR services, and promotion of equal, effective and meaningful participation by individuals with disabilities in workforce development activities in the state through the promotion of program accessibility (including programmatic accessibility and physical accessibility), the use of nondiscriminatory policies and procedures, provision of reasonable accommodations, auxiliary aids and services, and rehabilitation technology.

MDRS has considered the results of the comprehensive statewide needs assessment (as stated in (j) Statewide Assessment) in developing strategies to achieve the goals and priorities stated in this plan.

Through the MDRS Assistive Technology (AT) Program, nine Rehabilitation Technologists and two Rehabilitation Engineers are strategically located throughout the state to provide consultation on all AT referrals as well as perform initial evaluations and assessments; procure and set up AT equipment; provide follow-up evaluations; design and fabricate original items; and, provide specifications and final inspections for AT services. VR Counselors evaluate the need for AT services throughout the rehabilitation process.

MDRS has a Cultural Diversity Taskforce that develops strategies to reach minority populations, especially the African American and Hispanic population, including those with the most significant disabilities. In each District, under the direction of the District Manager, monthly outreach activities are coordinated throughout the district to help ensure that information regarding Vocational Rehabilitation is disseminated. The taskforce members make recommendations for service delivery and outreach to minority groups. The taskforce creates plans for facilitated activities in the area of cultural diversity specific to each geographical area. The outreach activities that staff participate in assist in obtaining referrals and providing services to minority populations and those that are underserved and unserved. MDRS also has increased its communication and marketing to provide outreach to various areas in this state. This communication and public awareness will serve to assist in increasing referrals and providing VR services.

MDRS will continue to work with Workforce Partners to improve the services that are provided to individuals with disabilities. A common intake system has been created to assist in serving individuals with disabilities as well as on-going training with workforce staff and partners.

Each VR Regional Manager is represented on the local workforce boards and participate in quarterly meetings.

Based on information obtained from staff at Mississippi Department of Employment Security and data obtained from the National Strategic Planning & Analysis Research Center(NSPARC), in 2016 approximately 4,527 individuals who received services. These are individuals who have answered "yes" to the disability question on their profile in MSWorks.

MDRS is still collecting baseline data for the performance measures under section 116 of WIOA. We have submitted RSA 911 for two quarters of the fiscal year.

#### Methods to expand and improve services:

- 1. Designate staff in each MDRS district to be responsible for conducting outreach and orientation sessions on a regular basis
- 2. Utilize our relationships with workforce partners at the state and local levels in order to have more options and resources available for job placement and training.
- 3. Share specific agency expertise to facilitate interagency knowledge to improve services to all participants with disabilities served by any agency within the workforce system.

- 4. Annually evaluate physical locaiton of VR staff to assure that all geographic areas of hte state are covered with appropriate service delivery staff.
- 5. Administer a consumer satisfactory survey while the consumer's case is open with VR
- 6. Administer a consumer satisfaction survey with the consumer regarding services recieved from vendors/providers of VR services
- 7. Use case review results to identify and implement improvements and quality consistency of service
- 8. Increase collaboration within the state's workforce system to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs

Reference; VI-VR o.8.A for goals and priorities.

2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

Through the MDRS Assistive Technology (AT) Program, nine Rehabilitation Technologists and two Rehabilitation Engineers are strategically located throughout the state to provide consultation on all AT referrals as well as perform initial evaluations and assessments; procure and set up AT equipment; provide follow-up evaluations; design and fabricate original items; and, provide specifications and final inspections for AT services. VR Counselors evaluate the need for AT services throughout the rehabilitation process.

3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

Based on this data in Section J1c, the following minority groups are underserved: American Indian and Alaska Native; Asian; Hispanic or Latino.

Based on the Comprehensive Needs Assessment and other data received from VR Case Management System, individuals with Mental Illness, Cognitive Disabilities and Autism Spectrum Disorders are the primary emerging population that are reported as underserved and who staff has requested the most assistance in understanding the disability in terms of employment. VR will seek to provide more training and resources to assist staff in serving this population.

To assist in reaching the underserved populations identified;

- Brochures will be updated and developed in order to utilize for outreach activities that will assist in a better understanding of VR services.
- District Outreach teams to provide outreach activities in their local communities in efforts to obtain referrals for individuals from diverse populations.
- Printed media such as brochures and other information in Spanish.

MDRS will continue to monitor the ACS survey for the most recent regarding the race and ethnicity per county so we will know where the information should be disseminated.

MDRS will also continue to provide outreach to other minority populations to ensure they have information regarding the VR program.

- 4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and preemployment transition services).
  - Engage with key partners such as MDE, the SRC, local school districts, community
    colleges, and other training and education programs in designing an improved service
    delivery model that will develop stronger partnerships to place increased emphasis on
    serving transition high school students with disabilities
  - Community outreach and orientation will establish relationships with parent training and information groups, advocacy groups, and other service providers to encourage referral and parental participation in the development and provision of transition services
  - Increase collaboration with Community Colleges to improve coordination of VR services with community college programs and Adult Basic Education programs to facilitate transition from secondary to post-secondary activities
  - Develop and implement on-campus work experience training in order to provide work experience to students who cannot get into a vocational training program or opportunities for vocational training are not readily available in a community based setting
  - Summer Internship Program for high school students with blindness and visual impairments, and deafness and hard of hearing
  - Engage with key partners such as MDE, SRC, high schools, community colleges, and other training and education programs in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who are in special education
  - Engage with key partners such as MDE, SRC, high schools, community colleges, and other training and education programs in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who are not in special education
  - Plan and coordinate with the MDE Special Education Director to conduct at least annual training and semi-annual work groups for the purpose of cross-training in understanding the services offered by VR
  - When developing the Youth Transition Handbook the design should be complementary to the MDE Special Education Transition Handbook

# 5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Plans for improving community rehabilitation programs (private and agency-supported) include training staff to provide Pre-ETS, customized employment services, and on-the-job tryout services which facilitate the agency's ability to achieve the changes in WIOA.

# 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

MDRS is collaborating with workforce partners through the State Workforce Development Board to integrate our agency's computer system with the workforce computer system, MS Works, to facilitate common intake, data sharing, transmission of performance measures and other appropriate data.

# 7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

The VR/VRB partnership within Mississippi's one-stop system is clarified through Memoranda of Understanding with the State and each of the four local workforce development areas. The partnership is further enhanced through a Memorandum of Understanding (MOU) with the Mississippi Department of Employment Security (MDES), the lead state workforce agency designated to disburse federal workforce funds and the main operator of the WIN Job Centers, to continually improve the lifestyle, acceptance and accessibility of persons with disabilities within Mississippi's WIN. These MOUs include language to provide for intercomponent staff training and technical assistance on availability of benefits and information on eligibility standards for VR services, and promotion of equal, effective and meaningful participation by individuals with disabilities in workforce development activities in the state through the promotion of program accessibility (including programmatic accessibility and physical accessibility), the use of nondiscriminatory policies and procedures, provision of reasonable accommodations, auxiliary aids and services, and rehabilitation technology.

MDRS has considered the results of the comprehensive statewide needs assessment (as stated in (j) Statewide Assessment) in developing strategies to achieve the goals and priorities stated in this plan.

Our relationships with our workforce partners will enhance our ability to achieve the following innovation and expansion activities through closer working relationships and introductions to employers:

- VR/VRB Summer Internship Program with specific focus on students who are blind and students who are deaf
- MDRS EmployAbility Job Fair in partnership with the Governor's Job Fair network that highlights the On-the-Job training initiatives for employers that hire a person with a disability
- Outreach and Orientation sessions to target unserved and underserved individuals with disabilities in rural communitiesContinue to work with WIOA partners to identify barriers relating to equitable access and to ensure participation of individual with disabilities
- Provide ongoing training to job center staff on disability sensitivity issues
- Co-locate staff in WIN Job Centers where appropriate
- Continue to expand partnerships and encourage coordination of services

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- Increase partnerships with the statewide workforce investment system to develop innovative programs to serve common customers.
- Ongoing training of job center staff on disability sensitivity issues.
- Cooperation with job center network is valuable to consumers who can work on certain aspects of their job search independently. •
- Job readiness classes that focus on how to communicate skills and address their disability to the employer.
- Improve comprehensive assessment before referring to general programs for employment search.
- Development of new ways to provide for job creation or to incentivize employers
- Work cooperatively to remove stigmas in the workplace.
- Use of Customized Employment when appropriate.

#### 8. How the agency's strategies will be used to:

### A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

Strategies to Achieve Goals — Title 1 The following strategies will be required to achieve the goals and priorities as listed in (l) State Goals and Priorities and (n) Goals and Plans for Distribution of title I Funds:

#### **Strategies**

### Goal I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.

#### **Strategies (Plan of Action)**

- 1. Develop a job placement culture by providing on-going training in the job development and placement process.
- 2. Business Relations Specialist into the job placement culture in each district.
- 3. Re-design and improve Business Relations Services that will target services to businesses.
- 4. Designate a VR Program Coordinator who is responsible for the development of Business Relations Services program.
- 5. BRS Program Coordinator will provide assistance in supervising, coordinating and/or provide training for Business Relations Specialist.
- 6. Business Relations Specialist will providing information to VR staff the areas as follows:
  - \*the services BRS provide to employers,
  - \*training and information regarding work incentives,

- \*job analysis and job matching,
- \*career opportunities in the local area; and
- 7. Develop and implement on campus work experience training in order to provide students who cannot get into or opportunities for vocational training are not readily available in a community based setting.
- 8. Refer those consumers receiving SSI/SSDI cash benefits who are interested in earnings that will eliminate their reliance on SSA cash benefits for work incentives benefits analysis and counseling.
- 9. Coordinate and conduct the Annual Governor's Job Fair for individuals with disabilities.
- 10. Summer Internship Program for high school students with blindness and visual impairments; and deafness and hard of hearing.

# GOAL II: Improve the VR Service Delivery System to Individuals with disabilities Strategies (Plan of Action):

- 1. Designate staff in each MDRS districts to be responsible for conducting outreach and orientation sessions on a regular basis.
- 2. Provide input to assure appropriate inclusion of vocational rehabilitation activities in, public service announcements, and agency website and publications.
- 3. Update and distribute vocational rehabilitation brochures to appropriate referral sources.
- 4. Designate and train specific staff members in each district to handle referrals and provide information to the public.
- 5. Assure that all geographic areas of the state are covered with appropriate service delivery staff.
- 6. Develop and implement a consumer satisfaction survey to be completed while the consumer's case is open with VR.
- 7. Develop and consumer satisfaction survey to be completed by the consumer regarding services received from vendors/providers of VR services.

# Goal III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments. Strategic Objective(s):

1. Improve economic and career success of youth and students with disabilities

#### **Strategies (Plan of Action):**

1. Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to

- place increased emphasis on serving transition high school students who are in special education.
- 2. Engage with key partners such as the Department of Education, State Rehabilitation Council, high school, community colleges and other training and education program in designing an improved service delivery model that will develop stronger partnerships to place increased emphasis on serving transition high school students who **are not** in special education.
- 3. Co-develop a formal interagency cooperative agreement with officials from the Department of Educations, local school districts and local high schools.
- 4. Plan and coordinate with the Mississippi Department of Education Special Education Director and Director of to plan and conduct at least annually training and semi-annual work groups for the purpose of cross-training in understanding the services offered by Vocational Rehabilitation.
- 5. Develop and implement the use of an OVR Transition Manual designed to assist staff in the delivery of transition services. This manual will be used as a technical assistance tool for transition planning purposes.
- 6. Develop a Youth Transition Handbook designed to assist OVR staff, teachers, students and their families in the delivery of transition services. This handbook will be used as a technical assistance tool for transition planning purposes. This handbook will be designed to complement the Mississippi Department of Education Special Education Transition Handbook.
- 7. Annually identify 504 coordinators and special education staff for each school.
- 8. Develop public relations materials that describe transition services.
- 9. Co-develop and implement self-identification tool identifying youth with disabilities who could possibly benefit from transition services.
- 10. Establish relationships with parent training and information groups, advocacy groups and other service providers to encourage referral and parental participation in the development and provision of transition services.
- 11. Establish comprehensive guidelines and indicators for assessing the individual transition needs of students.
- 12. Work with other core partners in the Workforce System to provide employment related services so that services will not be duplicated.

### Goal IV: Implement identified improvements to increase statewide consistency and quality of consumer services.

#### Strategies (Plan of Action):

- 1. Use results of the annual case review to determine where additional guidance and training are required.
- 2. Utilize the new counselor training process for mentoring, training, and leadership development for all VR counselors.
- 3. Utilize and continue to develop consistent training process for key VR staff that deliver direct client services.
- 4. Conduct annual statewide case record reviews of case service practices to determine consistency and adherence with federal/state requirements. Use case review results to identify and implement improvements in quality and consistency of services. Survey DVR

- staff on practices and provide refresher training to assure consistent and quality service delivery.
- 5. Deliver high quality training and support to provide staff with the knowledge and skills needed to perform effectively.
- 6. Recognize and appreciate staff throughout the Division for their contributions to the VR's success.
- 7. Continue to update and deliver advanced best practices training to field staff statewide to provide ongoing skill development in key service delivery operations and practices, including a strong focus on customer service, cultural sensitivity, and better addressing each consumer's impediments to employment.
- 8. Increase collaboration within the Workforce System to improve services to unemployed workers with disabilities who are eligible for VR services by better leveraging services with other workforce development programs.
- 9. Play stronger roles on state and local Workforce Boards to assure that VR consumers and other individuals with disabilities are better served by the One-Stop System.
- 10. Increase collaboration with Community Colleges to improve coordination of VR services with community college programs and Adult Basic Education programs.
- 11. Implement written agreements providers of services for individuals with intellectual and development disability programs to affirm their roles and responsibilities for jointly serving VR consumers, including their capacity for providing long term employment supports to individuals after the VR case rehabilitated.

#### B. support innovation and expansion activities; and

Please see the section above.

C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

Please see the section above.

# p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

Report of Progress for VR Program

Goal I: Improve the employment, economic stability, and self-sufficiency of eligible individuals with disabilities.

**Report of Progress:** 

- Training on Job Placement was held in October 2016 by Dr. Charles Palmer from Mississippi State University
- Beginning October 2016 2017, VR advertised and selected ten (10) VR Counselors to serve as VR Career Counselors. The role of the VR Career Counselors is to work with General VR Counselor and Business Development Specialist to provide and assist in deeming the as "Job Ready". At the appropriate time, VR Counselor refer the clients to the VR Career Counselor to begin Job Search/Job Prep services that include but are not limited to: Resume building, appropriate interviewing skills, assistance with job development, etc. The VR Career Counselors also communicate, work with and provide information to the Business Relation Specialist regarding clients they are working with to be Job Ready. Therefore, include of going to multiple counselors in each district, the OBD staff and one point of contact.
- The Office of Business Development added new Business Relations Specialist to assist in providing services to employers and assist with placing VR and VRB clients on internships, on-the-job training opportunities, and job placement.
- A designed VR Program Coordinator was assigned to work with the Career Counselors and to ensure bridge the connection and communication with Office of Business Development.
- In 2016, OVR implemented the On-Campus Work Experience (OCWE). The OCW is a short-term training program that will assist a student with gaining hands-on work experience for a pre-determined amount of time during the school year. The training will consist of three to four individual work experiences (IWEs) and will last from four to six weeks. Although there is some on-the-job learning, it differs from on-the-job-training because of its short-term nature and partnership with the school district. OCWE can be used as a tool to help identify the student's interests, strengths, and areas of needed improvement. In 2017, 36 students participated in the program.
- Employability Job Fair Jackson Medical Mall, Jackson, MS that focused on the hiring of individuals with disabilities was held March 29, 2017. 56 Employers were registered; 750+ job applicants attended; 4910 visits were made to employer's booths; 130 on-site interviews were conducted; 83 job offers were made at job fair; 221 projected job offers are expected to be made as a result of the job fair.
- Employability Job Fair held at The Arena in Southaven Ms. 29 Employers were registered; 275+ job applicants attended; 959 number of visits to employer's booths; 231 on-site job interviews conducted; 33 job offers make the day of job fair; and a projected number of 177 hires will be made during the next year.
- Employability Job Fair held at Lyman Community Center, Mississippi Gulf coast on June 28, 2017. 43 employers were registered; 500+ job applicants attended; 3470 visits were made to employer's booths; 175 onsite interviews conducted; and 39 job offers made the day of job fair.
- Summer Internship data for blind and deaf: In 2017, eight (8) consumers who were deaf participated in the summer internship program; 53 general VR clients and 11 Project Search interns participated for a total of 72.

 In 2017, a total of 326 clients received Benefits Counseling from our Community Work Incentive Partners

January 2017 - Total 16

February 2017 - Total 53

July 2017 - Total 23

**August 2017 - Total 42** 

September 2017 - Total 46

October 2017 - Total 43

November 2017 - Total 32

December 2017 - Total 29

• At least one Business Development representative is strategically located in all 10 districts across the state of Mississippi. We also have more than one representative in certain geographic locations due to population density. Our team is made up of 13 field representatives and 3 leadership staff.

In 2017, 11,283 individual contacts to businesses in the state of Mississippi were made by Business Development staff. 145 businesses were engaged and attended our 3 job fairs held in Southaven, Jackson, and Gulfport, Mississippi. 65 Interns were placed in our annual Summer Internship Program that focuses on creating job skills, career exploration, and building resumes from high school and college youth looking to enter the workforce. Also, in 2017, 3,376 individual "job hunting" calls were made to businesses for the purpose of finding our individual clients specific employment opportunities around the state of Mississippi. Out of the 11,283 contacts to business, 5,373 calls were made to new accounts (businesses never contacted before), or a percentage of 48% of total outreach. 5,042 calls were made where the services of BD/VR/VRB were described to the business. Finally, throughout 2017, 2,901 individual job openings were identified across the state or 26% of calls made identified a potential job opening.

Goal II: Improve the VR Service Delivery System to Individuals with Disabilities

- Beginning in 2016, VR developed the Outreach and Orientation program that is to be utilized by all district staff to conduct outreach when meeting with other organizations and service providers. It is also our plan that Orientation sessions will be held at a minimum of once per month in each district. All information and material to be used has been developed. This program is assigned to a VR Program Coordinator who work with the staff. The Program Coordinator also when throughout the state demonstrating how the sessions shall be conducted. VR will continue to ensure that this program is on-going. Progress on this has been slow due to other major responsibilities.
- Agency website and brochures have been developed and updated. MDRS has created videos that demonstrate services that can been viewed by referral sources.

VR has new brochures that cover Transition services, Pre-Employment Transition Services, Supported Employment, etc.

• In 2017, a new Consumer Satisfaction Survey was developed for open VR cases. The first survey will be conducted in 2018.

Goal III: Implement a statewide model for more effectively serving high school youth and students with disabilities including individuals with visual and/or hearing impairments.

- A statewide training was conducted in 2016 that included all VR/VRB counselors and staff, and Special Education coordinators from schools throughout the state. This training assist VR in explaining the role of VR in serving students that have an IEP and 504 plan as well as serving students that are not receiving special education services. We are in hopes that we will continually see an increase in referrals for these students.
- In 2017, the updated formal Interagency Cooperative Agreement was developed with the Mississippi Department of Education. MDRS also updated our local school agreements.
- In 2016, the OVR Transition Manual designed to assist staff in the delivery of transition services. This manual is used as technical assistance for transition planning purposes. Training was held in each district statewide with counselors that are assigned to local schools/school districts.
- Annually, the OVR Transition Coordinator updates and maintains a list of all 504 coordinators and special education staff for each school district. The list is a document that can be accessed by all staff on the MDRS intranet MDRS Connect.
- In 2015 and in 2018, OVR completed its Comprehensive Transition Assessment. The results of this assessment is included in this state plan.
- In 2017, Community Work Incentive Partners participated with VR Counselors in providing pre-employment self-advocacy training by providing information on Benefits Planning at 24 high schools and presented to 456 students.

Goal IV: Implement identified improvements to increase statewide consistency and quality of consumer services.

The Program Evaluation Unit has completed a review of cases for all OVRB caseloads. Five cases were reviewed for each counselor's caseload(s). Three active and two closed cases were reviewed for a total of 85 cases. Counselors were notified of the cases to be reviewed less than 24 hours prior to arrival of the program evaluation unit. The overall accuracy percentage was 90% for all OVRB cases reviewed by the program evaluation unit.

In the eligibility section the overall accuracy percentage was 97% by the program evaluation staff.

In the IPE section the review indicated the overall accuracy rate of 78% by the program evaluation staff.

The authorization section revealed an overall accuracy of 99.5%.

The Program Evaluation Unit has completed a review of cases for all OVR caseloads. Five cases were reviewed for each counselor's caseload(s) with the exception of one caseload. Three active and two closed cases were reviewed for a total of 553 cases. Counselors were notified of the cases to be reviewed less than 24 hours prior to arrival of the program evaluation unit.

The overall accuracy percentage was 80% for all 10 OVR Districts reviewed by the program evaluation unit.

In the eligibility section the overall accuracy percentage for all districts was 89% by the program evaluation staff.

In the IPE section the review indicated the overall accuracy rate of 65% by the program evaluation staff.

The authorization section revealed an overall accuracy of 97%.

After reviewing the closed rehabilitated cases, the overall accuracy rate was by the program evaluation staff rate was at 96%.

The closed other section revealed an overall accuracy rate of 89% by the program evaluation reviewers.

B. Describe the factors that impeded the achievement of the goals and priorities.

Although WIOA was signed into law on July 22, 2014, federal regulations were not received until June 28, 2016. New regulations required a review of policy and procedures to identify areas there updates were needed to reflect changes in the law. Because of implementation of a new law and policy changes, VR is still currently working to achieve the goal and implement the strategies outlined in this state plan.

2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

Report of Progress for the SE program for 2017.

#### Goal I.

Continue the referral process between MDRS and DMH to identify "youth with the most significant disabilities" who will require SE services. The MDRS SE Program Coordinator receives the referral from the DMH Support Coordinator/Target Case Manager. The SE Program Coordinator then forwards the referral to the SE Counselor for determination of VR service.

Report of Progress:

- One hundred and three (103) referrals were received and processed from DMH
- The following Career Counseling and Information Services was provided at the following Sheltered Workshops:

#### Goal II.

Continue the referral process between the VR Transition Counselor and the VR (SE) Supported Employment Counselor for students with disabilities ages 14-21 who have been determined to need long term ongoing support services. The VR Transition Counselor will take the referral from the MDE, determine eligibility, complete the assessment and discovery process and work with the SE Counselor to develop the IPE with the student, parents/guardians, and school. Once the IPE has been signed by all the required parties, then the student's case will be transferred to the SE Counselor's caseload.

#### Report of Progress:

One hundred and seventy-three (173) students were identified that had been determined to need long term ongoing support services.

#### Goal III.

Provide training to all SE staff by a highly experienced professional in the area of customized employment.

Report of Progress: Discovery" training, a part of customized training was conducted at all ten (10) districts by Supported Employment/Transition Program Coordinators.

#### Goal IV.

Train all Transition staff and SE staff on the new policies and guidelines for SE services.

Report of Progress: As policy changes, all Transition/Supported Employment staff are trained accordingly.

#### B. Describe the factors that impeded the achievement of the goals and priorities.

Although WIOA was signed into law on July 22, 2014, federal regulations were not received until June 28, 2016. New regulations required a review of policy and procedures to identify areas there updates were needed to reflect changes in the law. Because of implementation of a new law and policy changes, VR is still currently working to achieve the goal and implement the strategies outlined in this state plan.

### 3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

The Workforce Partners in Mississippi are working together to create a Shared Data Warehouse that will link our separate case management and data systems. We refer to this as "The Hub", and are working with a vendor, *nSPARC*, to create this data warehouse and bridge. National Strategic Planning & Analysis Research Center (nSPARC) designed and wrote the HUB. Founded in 1998, NSPARC is a university research center with more than 100 diverse employees, ranging from data scientists to software architects and security experts. NSPARC supports Mississippi State University's overarching goals of research, learning, and service by collaborating within the university, through local, state, and federal agencies, and across the private sector to help society grow by discovering solutions to societal problems by using data science. They pursue entrepreneurial and collaborative initiatives to develop and maintain a pipeline of intellectual property and innovative technologies that positively impact real-world

problems. NSPARC is headquartered in Starkville, Mississippi, adjacent to Mississippi State University's campus.

MDRS entered into an agreement with nSPARC, to develop a proof of concept in regards to how MDRS would capture the required data into the HUB. The proof of concept was tested and completed in March of 2016. nSPARC was able to use MDRS' proof of concept in order to move forward with developing the HUB for all partners.

MDRS entered into another agreement with nSPARC and our software vendor Alliance in July of 2016. This agreement was for MDRS to provide the necessary data needed for the HUB from our current case management system and to update our Referral Module with the new process of our getting and receiving referrals from our partners. From July of 2016 until June of 2017, Alliance, MDRS, nSPARC met to work through the process of how the data would be exchanged between the HUB and our Case management system.

All partner agencies will complete their separate intake forms with new customers. In each of these separate forms, however, there are **six diagnostic questions** that willbe thesame on all **forms and multiple demographic fields that are shared between partners (Intake)**. These data elements will automatically be uploaded into the Hub - or autofill - if the unique identifier matches a profile that already exists in "the Hub". If data in these areas is different than the information that was previously in the profile, this information will be updated with that from the most recent entry. The initial version of the HUB was completed in June 2017. MDRS has been sending data to the HUB since that time.

The WIOA hub software development was released and launched into the production environment on May 23, 2017. The other partners have been phasing in sending their data between January 2018 and June 2018. In the future, the PIRL for the State of Mississippi will be created thru the HUB.

Alliance is the vendor that provides the case management system (Aware) for Mississippi Department of Rehabilitation Services (MDRS) and for the VR/VRB programs in at least 35 other states. MDRS has been working with Alliance to ensure that the performance measures are included in Aware. Alliance will have these reports available by June 2018. Alliance has multiple user groups that meet about Aware between 35+ states that use Aware. The WIOA/RSA-911 and the Aware VR User Groups are two that are involved in ensuring that all federal reports and WIOA requirements are met.

WIOA/RSA-911 User Group met <u>January 19, 2016, May 25, 2016, June 2, 2016, October 24, 2016, November 1, 2016, November 29 2016, December 20, 2016, February 14, 2017, February 21, 2017, February 28, 2017, March 14, 2017, June 13, 2017, and August 8, 2017.</u>

Aware VR User Group met June 15, 2017, August 17, 2017, September 21, 2017, October 19, 2017, October 20, 2017, October 24, 2017, December 5, 2017, December 21, 2017, January 18, 2018, February 15, 2018, and March 15, 2018.

There were two major releases of Aware in March 2017 (included new RSA 911 report and the HUB related interface) and October 2017. There have been other minor releases that addressed things related the WIOA/RSA-911. The next release will have the performance measures reports in it.

MDRS has submitted two quarters of RSA 911 information in order to be able to report on the performance measures.

## 4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

See section on Evaluation and Report of Progress for innovation and expansion activities and the utilization of funds.

#### q. Quality, Scope, and Extent of Supported Employment Services.

Include the following:

# 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

The SE Program provides services to individuals with the most significant disabilities who require intensive support to prepare for, secure, retain, or regain employment. The services are designed to meet the current and future needs of these individuals whose disabilities are of such a nature that they need continuous, on-going support and extended services in order to engage in and maintain gainful employment. SE services include evaluation, assessment, job matching, job development, job placement, job coaching, brokering and training for natural supports to include extended services and other comprehensive follow along supports.

Under WIOA the new law requires that half of the allotment received under Title VI be used for provision of SE services, including extended services, to youth with the most significant disabilities (up to age 24), with administrative costs limited to 2.5% of the allotment. These youth may receive extended services (i.e., ongoing supports to maintain an individual in supported employment) for up to four (4) years. MDRS will invest all Title VI allocations to fund the purchase of job training services and other allowable vocational rehabilitation services as needed by clients served in the SE Program. Additionally, the Coordinator for the SE Program and the Coordinator for Transition and Youth Career Services will work together to ensure new policy is in place and the appropriate amount of funding is utilized for youth with the most significant disabilities.

Eligible individuals are those who are determined to be "most significantly" disabled, which means they meet the following criteria:

• individual has a "significant disability" \*individual's physical or mental impairments seriously limit three (3) or more functional capacities in terms of an employment outcome individual will require vocational rehabilitation services in order to prepare for, secure, retain, or regain employment

MDRS employs a unique strategy for delivery of SE services. The SE Program's structure and service delivery mechanism are integrated into that of the general agency service delivery system. The services are authorized, coordinated and, in most instances, delivered by staff of the state unit. Counselors who specialize in SE perform the functions of case management, job development, and supervision of overall SE service delivery in their respective districts. They are

assisted by Vocational Training Instructors (VTIs) who perform a variety of functions including assessment, job development and placement, job training, job coach supervision, and facilitation of natural supports. Job coaches are employed on an "as needed" basis. Counselors are assigned to serve SE eligible individuals in each of the 10 districts in order to ensure statewide coverage. The SE staff includes 11 Counselors, 12 VTIs, and a pool of available Job Coaches who are assigned to work with an SE client as needed. Additionally, this staff works with the statewide community rehabilitation program, AbilityWorks, Inc., a division of MDRS.

MDRS contends that its responsibility regarding SE is the same as its responsibility for the general program. The SE programs for both VR and VRB have been combined into one program serving all eligible individuals. SE counselors have the same duties and responsibilities as those in the VR and VRB programs. However, the caseloads of the SE counselors consist of only those clients who meet Title VI eligibility criteria. Therefore, in addition to general agency policy and procedures, SE staff members must be knowledgeable about Title VI regulations and the unique requirements for SE eligibility. Additionally, SE staff members are provided clerical support in the same proportion as the VR program staff.

Administration and implementation of the SE Program is assigned to the Bureau of Client Services within VR. SE personnel are trained in general VR case management techniques and Title I regulations, and are held to the same procedures and standards of performance as are the general counselors.

MDRS designates a SE statewide program coordinator whose duties include the following:

- monitor issues developing in the field of SE
- serve as a resource person to staff
- serve as advisor to administrative staff in implementing programmatic policies in accordance with federal dictates
- develop effective programmatic procedures
- recommend training of SE staff
- other typical functions of a coordinating and liaison nature

MDRS maintains formal agreements with the MDE and DMH as well as other public and private entities, which identify areas of collaboration to ensure a comprehensive program of services to SE eligible individuals. Staff members collaborate intensively with local mental health centers, school districts, SE businesses and industries, the DD Council, parents, advocacy groups and other relevant third parties.

The service approach for SE eligible clients emulates the nationally accepted "best practices" models of SE service delivery which include individual job placement, mobile crews, and temporary employment placement (TEP) for individuals with chronic mental illness. Central to each of these approaches is an emphasis on person centered planning and facilitation of natural supports. Individualized job development is conducted by SE staff based on job matching assessment information and client's informed choice. SE clients are assisted with employment planning and placement by VTIs and job skills training is provided at the job site either by job coaches or through natural supports.

To fulfill the requirements of the Rehabilitation Act, as amended by WIOA, regarding transitional employment for individuals with chronic mental illness, MDRS utilizes the TEP model. This model involves placement in a series of temporary jobs that lead to permanent employment as an outcome. This service approach is implemented through coordination with local mental health centers.

#### 2. The timing of transition to extended services.

Upon completion of time-limited SE services, the ongoing job skills training assistance and other necessary long-term support is transitioned to a third party, group or individual through a Cooperative Agreement or Extended Services Support Plan Agreement. MDRS entered into 114 new Extended Services Support Plan Agreements from July 1, 2015 through December 31, 2017. These 114 new agreements are in addition to the agreements previously established and still ongoing. WIOA increased the maximum amount of time for SE staff to provide time-limited supported employment services to 24 months. However, the rate of transitioning a client to extended services is dependent upon the needs of the individual, his/her family, the employer, the third party agency, and other involved individuals. Since SE staff members and the extended service provider will have been collaborating in the provision of SE services throughout an individual's VR program, such transitions are normally smooth and do not cause job disruptions.

MDRS will continue to cooperate in the networking of services with entities that have supported employment facets or other applicable and/or similar resources, such as the state's workforce development one-stop system. Such collaborative efforts are essential for effective planning, development, implementation and continuation of SE arrangements. Service networking will involve developing and identifying appropriate job sites, tapping existing or future job training resources, utilizing concurrent staffing opportunities, and other occasions for programmatic and budgetary interfacing.

Expansion of the SE Program is expected as a result of extensive outreach, staff development, interagency training, dissemination of information, identification and dissemination of information about best practices, technical assistance, and an emphasis on interagency collaboration for identification of potentially eligible individuals and service delivery to clients. MDRS continues to emphasize person centered planning by partnering with the Mississippi Council on Developmental Disabilities, MDE, and other entities in promotion of this service provision.

#### Certifications

Name of designated State agency or designated State unit, as appropriate Mississippi Department of Rehabilitation Services

Name of designated State agency Mississippi Department of Rehabilitation Services

Full Name of Authorized Representative: Chris Howard

Title of Authorized Representative: Executive Director

States must provide written and signed certifications that:

- 1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA\*, and its supplement under title VI of the Rehabilitation Act.\*\* Yes
- 2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes
- 3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan\*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;\*\* Yes
- 4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
- 5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
- 6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
- 7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes
- 8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
- 9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

#### **Footnotes**

#### **Certification 1 Footnotes**

\* Public Law 113-128.

\*\* Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

#### **Certification 2 Footnotes**

- \* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
- \*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
- \*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

#### **Certification 3 Footnotes**

- \* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
- \*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes

#### Additional Comments on the Certifications from the State

#### Certification Regarding Lobbying — Vocational Rehabilitation

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose

accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization

Full Name of Authorized Representative:

Title of Authorized Representative:

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT\_OCTAE@ed.gov

#### Certification Regarding Lobbying — Supported Employment

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under

grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization

Full Name of Authorized Representative:

Title of Authorized Representative:

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

#### Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: The State Plan must provide assurances that:

#### 1. Public Comment on Policies and Procedures:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

# 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and

its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

### 3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

- a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
- b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable (B) has established a State Rehabilitation Council

- c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
- d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
- e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds No

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs:  $N_0$ 

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No** 

- h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
- i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
- j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

I. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

#### 4. Administration of the Provision of VR Services:

The designated State agency, or designated State unit, as appropriate, assures that it will:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above Yes

- d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
- e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
- f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
- g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act.

i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

j. with respect to students with disabilities, the State,

- i. has developed and will implement,
  - A. strategies to address the needs identified in the assessments; and
  - B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
- ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

#### 5. Program Administration for the Supported Employment Title VI Supplement:

- a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
- b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

#### 6. Financial Administration of the Supported Employment Program:

- a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.
- b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

#### 7. Provision of Supported Employment Services:

- a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- b. The designated State agency assures that:

- i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
- ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State